



ARCATA PLANNING AREA



RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

September 1989



UNITED STATES
DEPARTMENT OF THE INTERIOR



BUREAU OF LAND MANAGEMENT
UKIAH DISTRICT

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REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

555 Leslie Street,
Ukiah, CA 95482-5599

Dear Reader:

Enclosed for your review is the Final Environmental Impact Statement (FEIS) for the Arcata Resource Area Management Plan. The Draft Environmental Impact Statement (DEIS) was published in December 1987, and was followed by a 90-day public comment period. Changes based upon public comments and agency review have been incorporated into this document and all portions of the draft have been reprinted in order to portray these changes. This FEIS contains the proposed resource management plan, which is a refinement of the preferred alternative presented in the draft. The proposed plan is the BLM's proposed action.

All parts of this proposed plan may be protested. Protests should be sent to the Director (202), Bureau of Land Management, 1800 C Street NW, Washington, D.C. 20240, within the official 30-day protest period following the publication of this document's Notice of Availability in the Federal Register. Protest statements should contain the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record.

A short concise statement explaining why the BLM State Director decision is wrong.

At the end of the 30-day protest period, the proposed plan, excluding any portions under protest, shall become the final. Approval shall be withheld on any portion of the plan under protest until final action has been completed on such protest. The Final Resource Management Plan and Record of Decision will be published this Fall.

Sincerely,

Al Wright

Al Wright
District Manager

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**PROPOSED
ARCATA
RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT**

**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

Ed Hunter

**State Director
California**

Proposed Arcata Resource Management Plan and Final Environmental Impact Statement

FINAL

1. Type of Action: Administrative
2. Abstract: The Proposed Resource Management Plan presents a comprehensive land and resource prescription for seven management areas in the Arcata and Clear Lake Resource Areas in the Ukiah District, California.

The Final Environmental Impact Statement analyzes alternatives to the Proposed Plan (Proposed Action) ranging from emphasis on consumptive uses to emphasis on protection of natural values.

3. For further information contact:

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SUMMARY

INTRODUCTION

The planning area is in northwestern California and includes the Arcata Resource Area except for the King Range National Conservation Area, and includes those portions of the Clear Lake Resource Area which were not addressed in the recent Clear Lake Management Framework Plan (MFP) or Cow Mountain MFP. The majority of public lands involved in this plan are in Humboldt and Mendocino Counties; small tracts are also in Trinity and Sonoma Counties. The plan covers approximately 257,000 acres of public land: 125,000 acres of public land and 132,000 acres of split estate where the surface is privately owned and the subsurface managed by the BLM.

The objective of resource management planning is to maximize resource values for the public through a rational, consistently applied set of procedures which promote the concept of multiple use management; resource management plans are designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources and uses.

The major thrust of this resource management plan is to address the viability of intensively managing timber resources within Sustained Yield Unit 13 (SYU 13) as specified in the 1981 Record of Decision. Since 1981, the complexion of SYU 13 has been significantly affected by Bureau-initiated exchanges, wilderness designation, State of California indemnity selections, and the increased occurrence of sensitive animal species on or near forest lands. Particular attention has been given to old-growth habitat and associated species, including the spotted owl.

The combination of these factors has resulted in a reduction in the availability of timber from public lands, reduced flexibility in managing old-growth dependent animal species, and increased the total of nonstocked acres.

The Draft Arcata Resource Management Plan was made available for public comment in January 1988. Public meetings were held in March and as a result of overwhelming demand public hearings were held in May. Written comments were accepted through July 1988. At the hearings 101 people provided public testimony and 1,079 written documents with 3,881 signatures were received during the comment period.

Two major issues surfaced in the public hearings. In Garberville, all who spoke did so in favor of preserving natural resources especially remaining old-growth forests. In Eureka, off-road vehicle use on the Samoa Peninsula was the major issue. People were either in favor or opposed to ORV use. Other issues raised included preservation of old-growth forests and old-growth dependent species, providing opportunities for equestrian use as well as general concerns for environmental issues.

Many written comments addressed specific management areas. Others were more general in nature. Both are briefly summarized below.

Samoa

The majority of those commenting did so either through form letters or petitions. Commenters were either opposed to ORV use because of its impact to the area's sensitive environment or favored ORV use. These people felt ORV use could coexist with other uses.

Scattered Tracts

The majority of comments received specifically on the Scattered Tracts Area were in the form of hand written letters. Almost all dealt with Gilham Butte and addressed the preservation of old-growth values and spotted owls.

Red Mountain

Like Scattered Tracts, the majority of comments received were hand written. Comments were either concerned about old-growth values in the Tom Long Creek area or wanted the Red Mountain/Cahto Peak area recommended for wilderness.

General Comments

Many comments were general to the RMP area and fell into two categories. A number of hand written letters commented on the preservation of old-growth or the old-growth reserve system. In contrast to these letters many form letters were received requesting the Bureau take whatever steps were necessary to keep commercial forest land in production.

A number of comments were received opposing Administrative Adjustments, primarily because of the impact to old-growth forest lands. Other commenters felt that public lands could be more effectively managed through consolidation.

As a result of the concerns identified by the public during the comment period several changes were made. The Proposed Action along with changes resulting from public input will be addressed by management area.

After analyzing the comments received on the Draft Environmental Impact Statement, a number of changes were made to the text and are incorporated into this document. Most are the result of typographical errors found in the Draft EIS or refinements to the data base. Others, like the change of the Proposed Action in the Scattered Blocks Management Area, are the result of public review. Other changes have been made for the purpose of clarification. These changes are explained in more detail in Chapters 2 and 4, but will not significantly alter the impacts described in the DEIS nor the scope of the DEIS.

The Proposed Action is the Bureau's "Preferred Alternative" and is used interchangeably throughout this document.

MANAGEMENT AREAS AND ALTERNATIVES

For effective analysis and alternative development, seven management areas have been delineated to focus the planning effort on the issues germane to a particular area. Following is a summary of these areas, and the alternatives and impacts of these alternatives for each management area. Table S-1 summarizes the cumulative impacts of these alternatives on the issues selected for analysis for the entire planning area.

SAMOA PENINSULA

The management area consists of two tracts of public land--the Samoa Dunes and Manila Dunes. Activity level plans for the Samoa Dunes have already been completed and are incorporated within each of the four alternatives which have been developed for the remainder of the management area. The NO ACTION/PROPOSED ACTION, remains unchanged from the draft. On Samoa, this proposal will allow sensitive dune ecosystems and wetlands to be protected while allowing for controlled ORV use. An ORV Activity Plan was written for this area in 1982. Over the last five years, several small modifications have been made to the plan to allow for increased wetland protection. In October of 1987, the District Advisory Council established an advisory group with representation from the ORV and environmental communities as well as the public at large. This group recommended further changes to the plan and will continue to be involved in the management of this area.) The Manila Dunes area will be designated as an Area of Critical Environmental Concern (ACEC) and Outstanding Natural Area (ONA). It will limit ORV use to open sand areas while protecting Menzies' wallflower habitat and the spruce forest.

Since the release of the DEIS, several management actions have been carried out within this management area. They include: 1) acquisition of 42 acres on the south side of the Manila Dunes parcel; 2) fencing of 25 acres of foredunes on Manila Dunes for research by Humboldt State University and closing the spruce forest area to ORV use; 3) establishment of a technical review team to provide BLM management information for Manila Dunes; and 4) construction of the Samoa Dunes ORV Park (wetlands protection fence, riding trails, staging area, etc.). All of these actions are consistent with present management objectives for this area.

During the review period for this Resource Management Plan Humboldt County started an ORV Use Plan for the North Spit of Humboldt Bay which includes both the Manila and Samoa Dunes area. The BLM has a mandate to design their management objectives to conform with local government management objectives whenever possible. Therefore, the decision on extent of ORV use on BLM public lands at Samoa/Manila will be based on the County ORV Use Plan after it is completed. If the actions outlined in the County's ORV Use Plan vary significantly from the Bureau Off-Road Vehicle Plan (1982) an amendment to the RMP will be prepared and an appropriate level of environmental analysis will be conducted.

Three other alternatives were also considered. Under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, controlled ORV use would be allowed on Samoa Dunes but prohibited altogether on the Manila Dunes parcel. The ENHANCEMENT of RECREATION VALUES ALTERNATIVE would promote vehicle use on Manila Dunes but may damage the dune ecosystem. The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE proposes disposal of over half of the management area. The most likely recipients would be organizations interested in maintaining the recreation use opportunities the area provides and preserving the sensitive plant species and dune ecosystem found in the area.

LACKS CREEK

Public land in the Redwood Creek watershed (Redwood National Park Protection Zone) has value for its old-growth characteristics and for timber management. Limited public land consolidation has occurred. The California State Lands Commission (SLC) has expressed interest in acquiring these blocks. Four alternatives were developed for this area. The TIMBER PRODUCTION/PROPOSED ACTION remains unchanged from the draft. This action emphasizes timber management and consolidation of public land to improve management efficiencies and to protect old-growth characteristics.

The Draft RMP identified an 1800-acre old-growth reserve candidate. The 1982 Management Framework Plan (MFP) established a reserve in the northern portion of the management area only--approximately 800 acres. The 800 acre preserve includes the best areas and protects many of the old growth values which exist in the area. However, the Draft RMP/EIS incorrectly identified the 1800-acre reserve to be designated as an old-growth ACEC in the No Action and Enhancement of Natural Values Alternatives. The Final RMP/EIS is corrected to show an 800-acre ACEC designation for each alternative except the Administrative Adjustment Alternative. All resource condition objectives, land use allocations, management actions and environmental consequences have been corrected to reflect this change, including timber production base and allowable cut calculations. In addition to establishing an 800-acre old-growth RNA/ACEC the proposed action would provide about 0.5 million board feet (MMBF) per year under the first rotation.

Other alternatives considered include the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE which formally establishes a 4,500-acre Research Natural Area/Area of Critical Environmental Concern (RNA/ACEC). This would result in the protection of old-growth habitat but a loss to the market of 32 MMBF, and provide an old-growth island between the Redwood National Park and Six Rivers National Forest. The NO ACTION ALTERNATIVE formally establishes an 800-acre old-growth RNA/ACEC, and still provides for timber production. The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would dispose of the management area; most likely to the State Lands Commission or surrounding timberland owners. This would provide timber to the market, but would adversely affect old-growth values and the Resource Area's timber resources.

BUTTE CREEK

This area has known spotted owl habitat (four known breeding pairs) and other high-quality old-growth values, and has high value for timber production. The State Lands Commission has expressed interest in acquiring these blocks. The ENHANCEMENT OF NATURAL VALUES/PROPOSED ACTION remains unchanged. All 2,500 acres in this management area will be designated as an ACEC and Research Natural Area (RNA) and managed to emphasize protection and enhancement of old-growth mixed evergreen forest characteristics and spotted owl habitat. The proposed action would protect 360 acres of old-growth habitat and four breeding pairs of spotted owls and result in the loss of 54 MMBF of standing timber volume.

Four other alternatives were generated for this management area. The TIMBER PRODUCTION ALTERNATIVE would ensure, under BLM administration, timber production on an average of 0.85 MMBF per year over the first rotation; this would result in the displacement of the four pairs of spotted owls. The NATURAL

HISTORY ALTERNATIVE proposes both timber production (about .40 MMBF per year) and protection of old-growth values (not specifically spotted owls). The NO ACTION ALTERNATIVE would formally designate the 360 acres in candidate old-growth reserve in Butte Creek as an RNA/ACEC and reduces harvest of existing standing timber volume from 0.85 MMBF annually to 0.40 MMBF over the first rotation. The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would dispose of this management area; most likely to the State Lands Commission as this is their highest priority for acquisition. Timber would be marketed and the old-growth values would probably be lost.

KING RANGE VICINITY

This management area includes tracts between the King Range National Conservation Area and the Mattole River. There were no specific resource issues identified in the management area, but two alternatives were developed to address the land tenure and adjustment issue. The ENHANCEMENT OF NATURAL VALUES/PROPOSED ACTION recognizes that the King Range vicinity is a logical geographic area in which to consolidate resources for more efficient management. This proposal will allow the Bureau to ensure consistency with the management of the King Range; will emphasize the enhancement of coastal wetlands and visual resources; and provides for a logical geographic focus for long-term Bureau management in this area. The NO ACTION ALTERNATIVE would dispose of 1,100 acres (historic use has been for exchange within the King Range National Conservation Area). Also, formal decisions would ensure consistency with land management themes within the National Conservation Area.

RED MOUNTAIN

Three alternatives were generated for this management area. The ENHANCEMENT OF NATURAL VALUES/PROPOSED ACTION remains unchanged from the draft. Because of existing designations and land use allocations covering large acreages (the Northern California Coast Range Preserve, Red Mountain RNA/ACECs, and Eel National Wild and Scenic River) many potential resource conflicts have been resolved and are not reanalyzed in this plan.

The proposal emphasizes protection of old-growth characteristics, unique botanical values, and peregrine falcons while providing 1.5 MMBF per year to the market over the first rotation. It proposes acquisition for timber, peregrine falcon habitat, and other natural values, retains the 300 acres mitigation for pairs of spotted owls as specified in SYU-13, and recognizes the significance of existing old-growth reserves in the area. Other alternatives considered include the NO ACTION ALTERNATIVE which would accomplish about the same as the alternative above. The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would dispose of much of the timber land to the State Lands Commission. Timber would still be provided to the market by SLC and the most significant old-growth values within the NCCRP and Cedar Creek would remain under the Bureau's administration and protection.

COVELO VICINITY

The State Lands Commission has already acquired large tracts from BLM within this management area. Opportunities exist for administrative adjustments with the U.S.D.A.-Forest Service for more efficient management of Federal interests and with the private sector to help block up more manageable tracts of public lands. Two alternatives were developed for this management area. The ADMINISTRATIVE ADJUSTMENTS/PROPOSED ACTION remains unchanged from the draft. This

action would dispose of all public lands, and would provide some of standing volume to the market. Significant old-growth values within the Big Butte portion of the Yolla Bolly-Middle Eel wilderness would be preserved. It also recognizes that tracts of public land (BLM administered) which are contiguous to the Mendocino and Six Rivers National Forests might be more efficiently managed by those National Forests as they lie well within their administrative sphere of influence. The impacts of the NO ACTION ALTERNATIVE are virtually the same as the alternative above, only the Federal trustee would be different--administration would remain with the BLM.

SCATTERED TRACTS

Several tracts have old-growth values and timber production. Because of their scattered nature these tracts are often difficult and expensive to actively manage. Three alternatives were developed for this management area. The Draft RMP identified the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE as the "preferred alternative." However, the preponderance of public input indicated that this alternative was not appropriate. As a result of input from an old-growth study group and a recommendation from the Ukiah District Advisory Council the NO ACTION ALTERNATIVE was selected as the Bureau's PROPOSED ACTION.

This change will include designating 3,600 acres in Gilham Butte and Iaqua Butte as ACECs/RNAs for the preservation of their old-growth values. The Eagle Peak/Greenough Ridge areas (2000 acres) and the Cedars (3000 acres) within the Clear Lake Resource Area will be retained to protect sensitive plant and animal species. Some 6,900 acres of scattered tracts will remain available for disposal and will be used in helping the Resource Area to consolidate lands through exchanges. As a result, some 1,700 acres within designated RNA/ACEC will be managed for their old-growth values; however, nearly 90 MMBF of standing volume will be removed from harvest.

Other alternatives considered include the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE which would most likely result in acquisition of some of the land by surrounding landowners. This would provide about 108 MMBF of standing volume to the market but would be detrimental to old-growth values. The ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would provide about 94 MMBF of standing volume to the market by disposal of public lands to private individuals. About 14 MMBF would be lost to the market because of establishment of several Research Natural Areas/Areas of Critical Environmental Concern (RNA/ACECs). These RNA/ACECs are significant old-growth stands which may be useful "stepping stones" for wildlife dispersal.

In summary, several changes were made in this document. They include more environmental protection for the Samoa/Manila area, an 800-acre ACEC/RNA for Lacks Creek, and changing the Proposed Action in the Scattered Tracts Management Area from Administrative Adjustments to No Action resulting in more land retention and the designation of old-growth ACEC/RNAs in Iaqua Butte and Gilham Butte.

As with Samoa, the recommendations for old-growth preservation represents the culmination of over ten years of work. The idea of some kind of an old-growth preservation system first surfaced in the 1970s. The Area's Timber Management

Plan, completed in 1980, identified some fifteen areas for study. The Scattered Blocks MFP, completed in 1982, identified five areas that should be preserved as some type of reserve.

Data provided to the Bureau on many of these areas by The Nature Conservancy helped determine which areas should be preserved in this plan. The Draft RMP recommended that only Butte Creek be protected, the other old-growth areas be returned to multiple use. However, after intense public input three additional areas--Lacks Creek, laqua Butte and Gilham Butte--were included in the final plan. These areas will all be designated as RNA/ACECs. The Cedar Creek old-growth area was included in the Red Mountain ACEC Management Plan and will be part of the old-growth system. The remaining areas identified in SYU-13 for study will be made available for multiple use.

TABLE S-1
COMPARISON OF ALTERNATIVES: CUMULATIVE SUMMARY OF ALTERNATIVES AND THEIR EFFECTS

ISSUE	NO ACTION ALTERNATIVE	ENHANCEMENT OF NATURAL VALUES	ENHANCEMENT OF RECREATION VALUES
Impacts on ORV Recreation Use Level (Samoa Peninsula)	ORV recreational use will be greatly enhanced, increasing ORV use from 11,000 visitor days per year to nearly 18,500 visitor days.	ORV recreational use would be enhanced, increasing ORV use from 11,000 visitor days per year to nearly 17,000 visitor days.	ORV recreational use would be significantly enhanced, increasing ORV use from 11,000 to nearly 22,000 visitor days per year.
Impacts on Botanical Values and Passive Recreation (Samoa Peninsula)	Botanical values and passive recreation opportunities will be protected and enhanced on the Samoa Dunes portion of the Samoa Peninsula and moderately benefited on the Manila Dunes portion.	Impacts would be the same as those described under the No Action Alternative.	Impacts on botanical values and passive recreation opportunities on the Samoa Dunes portion of the management area would be the same as for the No Action Alternative. There would, however, be a significant adverse impact on these values on the Manila Dunes portion.
Impacts on the Availability of Timber to the Market	5,500 acres of the area's 40,100 acres of commercial forest land (CFL) would be removed from the timber base reducing the amount of standing volume available to the market from 387 to 260 MMBF and the annual available cut from 6.15 to 4.16 MMBF/year. 6,200 acres of CFL would be acquired. This acquisition coupled with timber stand improvements and the acquisition of timber easements would significantly benefit the availability of timber to the market and timber resources over the long term (75 to 110 years), increasing the potential commercial timber to market from 260 to about 870 MMBF and the annual available cut from 4.16 to 13.92 MMBF/year.	7,400 acres of the area's 40,100 acres of CFL would be removed from the timber production base reducing the amount of standing volume available to the market from 387 to 255 MMBF and the annual available cut from 6.15 to 4.08 MMBF/year. 4,500 acres of CFL would be acquired. This acquisition, coupled with timber stand improvements and the acquisition of timber easements would significantly benefit the availability of timber to the market and timber resources over the long term (75 to 110 years) increasing the potential commercial timber to market from 255 to over 670 MMBF and the annual available cut from 4.08 to 10.72 MMBF/year.	Impacts would be the same as those described under the No Action Alternative.
Impact on Spotted Owls and Other Old-Growth Values	5,910 acres of the planning area's 6,190 acres of old-growth reserve would be preserved; 280 acres would be lost as a result of land disposal. None of the area's spotted owl population would be displaced. 9,650 acres would be designated RNA/ACECs and 5,340 acres would be acquired to protect the area's old-growth forest values.	2,690 acres would be preserved; 3,500 acres would be lost as a result of land disposal and timber management. No pair of spotted owls would be displaced. 17,900 acres would be designated RNA/ACECs and 9,010 acres would be acquired protecting and moderately enhancing the area's old-growth forest values.	Impacts would be the same as those described under the No Action Alternative.
Impact on Land Tenure Adjustment	10,400 acres would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. Of this amount 3,000 acres would be acquired by the State. The remainder would be exchanged to acquire Federal lands elsewhere. These land tenure adjustments, coupled with the acquisition of 12,340 acres for timber management and wildlife and riparian values, would moderately enhance the manageability of the area's resources.	12,620 acres would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. Of this amount, only one-third would be acquired by the State. The remainder would be exchanged to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 12,900 acres would moderately enhance the manageability of the area's resources.	Impacts would be the same as those described under the No Action Alternative.

TIMBER PRODUCTION	ADMINISTRATIVE ADJUSTMENTS	NATURAL HISTORY	PROPOSED ACTION
Impacts would be the same as those described under the No Action Alternative.	Impacts would be the same as those described under the No Action Alternative.	Impacts would be the same as those described under the No Action Alternative.	ORV recreational use will be greatly enhanced, increasing ORV use from 11,000 visitor days per year to nearly 18,500 visitor days.
Impacts would be the same as those described under the No Action Alternative.	Impacts would be the same as those described under the No Action Alternative.	Impacts would be the same as those described under the No Action Alternative.	Botanical values and passive recreation opportunities will be protected and enhanced on the Samoa Dunes portion of the Samoa Peninsula and moderately benefited on the Manila Dunes portion.
4,200 acres of the area's 40,100 acres of commercial forest land (CFL) would be removed from the timber base reducing the amount of standing volume available to the market from 387 to 340 MMBF and the annual available cut from 6.15 to 5.44 MMBF/year.	1,600 acres of the area's commercial forest land (CFL) would be removed from the timber production base reducing the amount of standing volume available to the market from 387 to 373 MMBF and the annual available cut from 6.15 to 5.97 MMBF/year. Approximately 6,200 acres of CFL would be temporarily removed from the timber production base to enhance the marketability of these lands, but would be made available to the market once the lands are disposed. The remaining 30,600 acres of CFL is slated for disposal but would be kept in the timber production base pending disposal. While these actions would have a moderate short-term benefit to the local economy, the Area's timber resources would be adversely affected.	5,500 acres of the area's 40,100 acres of commercial forest land (CFL) would be removed from the timber production base reducing the amount of standing volume available to the market from 387 to 261 MMBF and the annual available cut from 6.15 to 4.18 MMBF/year.	6,300 acres of the area's CFL will be removed from the timber base reducing the amount of standing volume available to market from 387 to 253 MMBF and the annual available cut from 6.15 to 4.05 MMBF/year. Approximately 13,000 acres of CFL will temporarily be removed from production, but become available once the lands are disposed. This will not significantly affect the local economy, but will have a short-term adverse impact on timber resource.
6,200 acres of CFL would be acquired. This acquisition coupled with timber stand improvements and the acquisition of timber easements would significantly benefit the availability of timber to the market and timber resources over the long term (75 to 110 years), increasing the commercial timber to market from 340 to 945 MMBF and the annual available cut from 5.44 to over 15.12 MMBF/year.		6,200 acres of CFL would be acquired. This acquisition coupled with timber stand improvements, and the acquisition of timber easements would significantly benefit both the availability of timber to market and the timber resource over the long term (75 to 110 years) increasing the commercial timber to market from 261 to almost 870 MMBF and the annual available cut from 4.18 to 13.92 MMBF/year.	5,300 acres of CFL will be acquired. This acquisition coupled with timber stand improvements, and acquisition of timber access will significantly benefit the availability of the market and the timber resource over the long term (75 to 110 years), increasing the potential commercial timber to market from 253 to nearly 600 MMBF and the annual available cut from 4.05 to 9.60 MMBF/year.
5,550 acres would be preserved; 640 acres would be lost as a result of land disposals and timber management practices. Five of eight pair of spotted owls within the planning area would be displaced. The remaining owls would be protected.	810 acres would be preserved; 5,380 acres would be lost as a result of land disposals displacing seven pair, and three individual spotted owls.	5,910 acres would be preserved; 280 acres would be lost as a result of land disposals displacing two of eight spotted owl pairs found within the planning area. The remaining owls would be protected.	Of the areas originally studied for old-growth values, 4 areas totaling about 7,100 acres will be designated RNA/ACECs to protect approximately 3,680 acres of old-growth habitat; 2,510 acres will not be protected and will be lost as a result of timber harvest or land disposal. One pair and one individual will be displaced. The remaining 7 pair and 2 individuals will be protected.
9,300 acres would be designated RNA/ACECs and 5,340 acres would be acquired protecting and enhancing the area's old-growth forest values.	There would be no special designation and no lands would be acquired.	10,542 acres would be designated RNA/ACECs and 6,240 acres would be acquired enhancing old-growth forest, wildlife, and riparian values.	5,600 acres would be acquired to help protect the area's more significant old-growth values.
10,000 acres would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. Of this amount only half would be acquired by the State. The remainder would be exchanged to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 12,340 acres would moderately enhance the manageability of the area's resources.	107,482 acres would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. 45,000 acres of these lands would be transferred to the USDA Forest Service. 29,000 acres would be acquired by the State and the remaining 33,482 acres will be exchanged to acquire Federal lands elsewhere. These land tenure adjustments, coupled with the acquisition of 1,200 acres in the King Range Vicinity would significantly benefit the manageability of the Scattered Tracts land throughout the area.	5,100 acres would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. Of this amount, 3,000 acres would be acquired by the State. The remainder would be exchanged to acquire Federal lands elsewhere. These land tenure adjustments, coupled with the acquisition of 12,600 acres would moderately enhance the manageability of the area's resources.	76,520 acres will be available to help satisfy the State's indemnity selection entitlement and consolidate Federal land ownership. 45,000 acres of these lands will be transferred to the USFS. Although the other 31,520 acres will be available for indemnity selection, only 3,000 acres will be acquired by the State. The remaining will be exchanged to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 12,700 acres will significantly enhance the manageability of the area's resources.

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CHAPTER 1

INTRODUCTION

CHAPTER 1

INTRODUCTION

LOCATION

The planning area is in northwestern California and includes the Arcata Resource Area except for the King Range National Conservation Area, and includes those portions of the Clear Lake Resource Area which were not addressed in the recent Clear Lake Management Framework Plan (MFP) or Cow Mountain MFP. The majority of public lands involved in this plan are in Humboldt and Mendocino Counties; small tracts are also in Trinity and Sonoma Counties (Map 1-1). The plan covers approximately 257,000 acres of public land: 125,000 acres of public land and 132,000 acres of split estate where the surface is privately owned and the subsurface managed by the BLM.

For purposes of analysis, the Planning Area has been subdivided into seven Management Areas (MAs) based on common features, problems, and/or management needs. These MAs represent vegetation types varying from old-growth forests in the north to chaparral covered, small acreage in the south.

PURPOSE OF AND NEED FOR ACTION

The purpose of the Proposed Plan in this final environmental impact statement is to identify what the BLM believes to be the best management approach for resolving identified resource management concerns and public issues for the next 10 years. These concerns and issues determined the need for planning by pointing out management opportunities or problems associated with current management.

A major thrust of the plan is to address the viability of intensively managing timber resources within Sustained Yield Unit 13 (SYU 13) as specified in the 1981 record of decision (ROD). Since 1981, the complexion of SYU 13 has been significantly affected by Bureau-initiated exchanges, wilderness designation, State of California in-lieu selections, and improved information on occurrence of spotted owls and other sensitive animal species on or near forest lands. The combination of these factors has resulted in reduced availability of timber from public lands, reduced flexibility in managing old-growth forests and old-growth dependent animal species, and an increase in the total of nonstocked and understocked commercial forest land.

Existing land use plans for the area are not responsive or do not address these new resource demands and will be replaced by the decisions forthcoming from this planning effort. Those plans to be superseded are East Mendocino, Red Mountain, and Scattered Blocks Management Framework Plans.

SCOPE OF THE RMP

The RMP will:

1. Identify specific lands suitable for state indemnity selections.
2. Identify land which the BLM should acquire/consolidate to enhance its mission.



3. Identify public lands for permanent timber management. Based on the RMP decisions a new allowable cut will be calculated.
4. Establish criteria and identify public lands for management of old-growth values, especially the northern spotted owl.
5. Identify appropriate uses for public lands on Samoa Peninsula.

BUREAU PLANNING SYSTEM

Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) requires the Bureau of Land Management to prepare, maintain, and use land use plans. In addition, the CEQ Regulations implementing the National Environmental Policy Act of 1969 (NEPA) list land use plans as generally being significant Federal actions requiring preparation of environmental impact statements (see 40 CFR 1508.18(b) (2)). Thus, the Bureau's land use planning process follows procedures outlined in both 43 CFR 1600 and 40 CFR 1500.

The process follows the general outline typical of any decision analysis:

1. Define goals.
2. Scope the issues and collect relevant data.
3. Develop information from the data and scoping process.
4. Evaluate the information and develop alternatives to address significant problems and conflicts.
5. Make a decision (Record of Decision).
6. Implement the decision.
7. Monitor the resources and track implementation of the planning steps.
8. Amend the decision and/or revise the plan when necessary.

ISSUES SELECTED FOR ANALYSIS

The following issues are the critical issues this plan addresses. They were developed in the early stages of the planning process by the Bureau, through public input, and coordination with other federal, state, and local agencies. Some of the issues identified in the chapter of the FEIS have been redescribed. This revision has not resulted in the development of any new issues, but has made the issues identified in Chapter 1 consistent with the issues analyzed in Chapter 4. Therefore, it was necessary to separate the ORV use issues from the sensitive plant habitat as both were analyzed in Chapter 4.

Spotted Owls and Other Old-Growth Forest Values

The Record of Decision for Sustained Yield Unit 13 recognized the need for protecting habitat of the northern spotted owl (*Strix occidentalis*). Absent official guidance, a minimum of 300 acres was set aside for each pair of spotted owls. As of 1986, 10 of 19 timber sales in the 10-year timber plan have, or are suspected to have, spotted owls. About 24 million board feet (MMBF) of the 50 MMBF scheduled to be harvested under this plan are affected by this mitigation measure. The tradeoff between spotted owls and harvest of old-growth timber needs to be reassessed in view of the unanticipated loss of timber available for harvest, recent research on the habitat requirements of the spotted owl, and BLM policies regarding sensitive species. Remaining spotted owl habitat may not only be threatened by BLM-initiated timber management, but also by disposal to other entities which may not have a multiple-use mandate.

Eighteen candidate old-growth reserves were originally proposed in 1980 (Table 4-8 SYU 13 Draft Timber Management Environmental Impact Statement) as a mitigation for loss of old-growth characteristics. The EIS Record of Decision (p. 7) called for study of these candidates to determine suitability as old-growth reserves. Out of these 18 candidates, 15 have been actually studied and brought forward through the Bureau's planning system. The BLM, through a Cooperative Agreement with The Nature Conservancy (TNC), inventoried the reserves (see Summary of Inventory Methodology, Appendix 1-1). Sufficient information now exists to determine suitability and management thrust for reserves of old-growth characteristics, including formal designation as Areas of Critical Environmental Concern (ACEC).

As a result of written input from the public concerned with old-growth values, recommendations from the Ukiah District Advisory Council and additional input solicited from an old-growth study group, five areas will be given old-growth reserve status in this plan and designated as RNA/ACECs. They include: Lacks Creek (800-acre old-growth reserve will be designated as an 800-acre RNA/ACEC), Butte Creek (360-acre old-growth reserve will be incorporated into a 2,500-acre RNA/ACEC), Iaqua Buttes (390-acre old-growth reserve will be incorporated into a 1,000-acre RNA/ACEC), Gilham Buttes (1,320-acre old-growth reserve will be incorporated into a 2,550-acre RNA/ACEC), and Cedar Creek (810-acre old-growth reserve will be incorporated into an existing ACEC). Charlton Creek/White Slide, Jewett Rock and Hulls Creek old-growth reserves were again looked at during the DEIS review process but were not included into the reserve system (see p. 1-6).

BLM's plan to preserve old-growth habitat and owls in five management areas provides islands of old-growth to link not only these five areas on BLM-managed lands, but are preserved to link with Forest Service Spotted Owl Management Areas (SOMAs) and with other Federal and State Park lands.

Availability of Timber to Market

There are currently 20,000 acres of commercial forest land which are nonstocked and in need of reforestation. Funding for reforestation has traditionally been limited. In addition, there is a demand for these type lands for nontimber uses such as wilderness, sensitive species and rural residential.

Lands within the Resource Area have also been used for exchanges and to settle the in-lieu entitlements (about 5,775 acres with standing volume of 74 MMBF have been selected by the State Lands Commission (SLC) for in-lieu entitlements and

about 5,720 acres with standing volume of 41 MMBF have been exchanged with the SLC for desert lands since 1981; 4,300 acres with standing volume of about 90 MMBF (Big Butte unit) were designated wilderness in 1984; and 6,500 acres with 150 MMBF of standing volume have been used for Bureau exchanges). The Federal government still owes the State of California about 52,000 acres worth of in-lieu entitlement. Also, the Bureau's forest land policy, the King Range Act, and other demands for Federal land uses and consolidation present both threats and opportunities for improvement of timber management.

The current commercial forest land base permits harvesting about 6 MMBF per year on a sustained yield basis.

Considering these factors, the question to be resolved is which of these lands are best retained in the forest base and managed as commercial forest land and which are best suited for other uses. Analysis will focus on costs of reforestation against potential timber volume, conflicts between timber management and surrounding land uses, and habitat values gained or lost with timber management emphasis.

Land Tenure Adjustment

Under the State's indemnity entitlement about 52,000 acres of land are owed to the state. Over the years about 5,775 acres in the Arcata Resource Area have been selected by the State. There is a need to determine whether any additional public lands will be available for selection. Aside from the need to satisfy the State's in-lieu entitlements, there is a need to improve the efficiency and quality of management of the public lands and to enhance the public's use of that land. Small, isolated parcels of public land scattered throughout the resource area are difficult to manage, and lack of legal access limits or precludes public use of many of these parcels. Through exchange or disposal of isolated parcels, the BLM would have opportunities to accommodate public works projects and to meet the need for recreation and for residential, commercial, industrial and agricultural land. Such actions could eliminate or reduce management burdens and costs and enhance resource values and land ownership patterns.

Botanical Values (Including Wetlands) and Passive Recreation (Samoa Peninsula)

Motorized vehicle use is a major component of recreational activities on the Samoa Peninsula and is expected to increase. This use, if unmanaged, may adversely impact habitat for Menzies' wallflower and associated communities on the Manila Dunes parcel. Additional attention is needed to protect this habitat and balance its protection with the increasing demand for motorized recreational use.

ORV Recreation Use (Samoa Peninsula)

ORV use in the Samoa and Manila Dunes area is steadily increasing. At the same time ORV use opportunities within the Resource Area, and particularly coastal areas, are diminishing. Possible restrictions applied in this area would control future ORV use despite a growing demand.

Humboldt County has initiated a Peninsula Plan for recreation use. In the interim BLM will protect critical dune area, spruce forest, and wetlands and continue to work toward more intensive ORV management.

ISSUES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

The following issues or concerns were identified in scoping and in the review of the DEIS but were not selected for detailed analysis in this proposed RMP and final EIS. The reasons for not analyzing these issues in depth are discussed below by management area.

RED MOUNTAIN

1. Public Proposal For Wilderness Designation of the Cahto Peak, Brush Mountain, and Elkhorn Ridge Areas.

A number of respondents expressed interest in wilderness designation for the Cahto Peak (CA-050-131), Brush Mountain (CA-050-135), and Elkhorn Ridge (CA-050-134) units. These units were considered for study in 1979, but were not designated as Wilderness Study Areas (WSAs) because they lacked outstanding opportunities for solitude or primitive and unconfined recreation due to their small size and the private ownership pattern. This decision was upheld by the Department's Interior Board of Land Appeals (IBLA) in 1983 (Michael Huddleston, 76 IBLA 116).

In October 1983, the Bureau acquired 2,833 acres in the South Fork Eel River corridor connecting the Elkhorn Ridge and Brush Mountain blocks. Despite the addition to these lands, the units were still found to lack outstanding wilderness characteristics--the lands had been previously roaded and logged and did not meet the minimum standards for a WSA. However, in response to the concerns raised by the public during the review of the DEIS, the Arcata Resource Area conducted an intensive wilderness inventory of the acquired lands as well as the Elkhorn Ridge and Brush Mountain Inventory Units in June 1989. Over 9,130 acres were inventoried and analyzed as one contiguous unit.

Like previous studies, the area was found to lack certain wilderness characteristics. Much of the unit has not retained its natural character--over 40 percent of the area has been logged over the last three decades. The lands between the mid-slope of the South Fork Eel River canyon and the river (roughly a quarter of the unit) have undergone the most extensive change as evidenced by the 50-miles of abandoned logging haul routes and skid trails and hundreds of tree stumps still visible today. Further north, a group camping area has been developed on private lands within the unit (Camp St. Michael) and several culverts, a 1,000 gallon holding tank, and water lines have been installed on public lands. The overall result is a landscape appearing unnatural with the imprint of man's work substantially noticeable.

For these reasons, the unit was dropped from further consideration.

2. Designation of the Charlton Creek/White Slide and Jewett Rock Areas as Old-Growth Reserves.

The Charlton Creek/White Slide area was one of the candidate reserves to be studied for old-growth characteristics. This area was not recommended as an old-growth RNA/ACEC because of manageability concerns and because this region has several significant old-growth areas, including Cedar Creek (Red Mountain RNA/ACEC), the Northern California Coast Range Preserve and the Big Butte portion of the Yolla Bolly-Middle Fork Eel Wilderness, establishing another old-growth reserve in this geographic area is unwarranted.

The Jewett Rock area was one of the candidate reserves to be studied for old-growth characteristics. Inventory shows that the area lacks significant old-growth characteristics; this area is dropped from further consideration as an old-growth reserve and will not be analyzed in the FEIS.

COVELO VICINITY

1. Designation of the Hulls Creek Area as an Old-Growth Reserve.

The Hulls Creek area was one of the candidate reserves to be studied for old-growth characteristics. Hulls Creek was determined to have very low potential as spotted owl habitat and lack of good old-growth forest characteristics. This region has several significant old-growth areas, including Cedar Creek (Red Mountain RNA/ACEC), the Northern California Coast Range Preserve, and the Big Butte portion of the Yolla Bolly-Middle Eel Wilderness. Establishing another old-growth reserve in this geographic area is unwarranted. Therefore, this candidate reserve is dropped from further analysis.

PLANNING CRITERIA

The following assumptions and constraints guide this RMP; they are intended to focus analysis on the critical issues, provide the framework for a comprehensive plan, and to judge the overall desirability of the alternatives. References are to the Federal Land Policy and Management Act of 1976 (FLPMA).

VALID EXISTING MANAGEMENT

Decisions and recommendations made in the following documents are still valid and will not be reanalyzed. Existing analysis is incorporated by reference in this RMP/EIS.

1. Yokayo Grazing EIS. The management of livestock will follow prescriptions of the Yokayo Grazing Record of Decision which is incorporated by reference and will not be analyzed. (See Appendix 1-2 regarding Manageability). Unless specifically prohibited by a particular alternative, all "manageable" public land is available for livestock grazing.
2. Wilderness Studies. Wilderness studies for four WSAs (Red Mountain, CA-050-132; Eden Valley, CA-050-241; Thatcher Ridge, CA-050-212; and Big Butte, CA-050-211) are incorporated into this RMP by reference. Refer to Red Mountain EIS, Eden Valley/Thatcher Ridge EIS and Statewide Section 202 (Nonsuitable) EIS.
3. SYU-13 Timber Management Plan/EIS. The BLM is committed to cost-effective, long-term timber management in northwestern California. The basic timber management parameters as presented in the SYU 13 EIS/ROD are not changed. Analysis will be focused on mitigations and commitments regarding old-growth habitat retention and management. The concept of managed old-growth (MOG) as the preferred silvicultural prescription is still valid. (See Appendices 2-1 and 2-2.) The 300 acres per spotted owl pair (p. A-12 of Appendix 2-2) may or may not be applicable depending on the management area and alternatives being addressed (see Land Use Allocations in Chapter 2 and Environmental Consequences, Chapter 4).
4. California Vegetative Management EIS. Any herbicide use will be consistent with procedures and limitations resulting from the California Vegetation Management FEIS and Record of Decision (November 1988). The herbicide treatment of 135 acres of grass referenced on p. A-6 of Appendix 2-1 is no longer an identified project.
5. Samoa Dunes OHV Plan. The management of recreation activities on the Samoa Dunes portion of the Samoa Peninsula management area will follow the prescription outlined in the Samoa Dunes Off-Road Vehicle Plan (1982) which is incorporated by reference and will not be analyzed. An abbreviated description of the project is outlined in Chapter 3 (p. 3-6) of this document. Also see Chapter 2 (p. 2-4).

GENERAL POLICY AND STANDARD OPERATING PROCEDURES (References are to FLPMA)

1. Management will be on the basis of multiple-use (Section 102(a)(7)).
2. Management will be on the basis of sustained yield (Section 102(a)(7)).
3. Public lands to be disposed are difficult and uneconomic to manage as part of the public lands and are not suitable for management by another Federal department or agency (Section 203(a)(1)).
4. Public lands are to be retained in Federal ownership unless disposal serves the national interest (Section 102(a)(1)).
5. Public lands will be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use (Section 102(a)(8)).
6. Public lands will be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970, as it pertains to the public lands (Section 102(a)(12)).
7. The Bureau will give priority to the designation and protection of Areas of Critical Environmental Concern (Section 202(c)(3)).
8. The Bureau will weigh long-term benefits to the public against short-term benefits (Section 202(c)(7)).
9. The Bureau will consider simplicity of execution of management schemes.
10. Manageability of public lands will consider:
 - a. Safety of the public and Bureau personnel with regard to road maintenance, illegal land uses, etc.
 - b. Relative cost-effectiveness of managing individual tracts.
 - c. Fiscal ability of Bureau to effectively manage lands and interests (including easements) in the long term.
 - d. Alternative management schemes--creative partnership with other agencies and organizations.
 - e. Willingness of other organizations and agencies to vigorously prosecute implementation of land use plan decisions made at their behest.

11. The BLM will not dispose of Wilderness Study Areas (WSAs), Research Natural Areas and Areas of Critical Environmental Concern, or other resources of high national interest to non-Federal agencies. Disposal of the habitat of endangered, threatened, or sensitive species to non-Federal agencies or nonprofit organizations (e.g., counties, State, The Nature Conservancy) may be considered only if the protection and conservation that would be afforded the habitat following transfer of title equals or exceeds the level afforded by Federal ownership. Such determination would be made by the State Director. Disposal of the habitat of officially listed endangered or threatened species would occur only after consultation with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act of 1973, as amended.
12. The general areas identified for acquisition under the alternatives are high priority areas which give the BLM direction for land and resource consolidation in order to improve manageability and cost-effectiveness. These proposed acquisitions are not intended to be an exhaustive list of every opportunity. Acquisition depends on willingness for sale or exchange, and other opportunities which arise that meet the resource condition objectives will be considered.
13. In instances where the legal descriptions for Special Designation are down to section only, the intent is to automatically include under the designation lands which may be acquired in those sections.
14. Special Designations for Red Mountain RNA/ACEC and the Northern California Coast Range Preserve ACEC and their management thrusts will not be reanalyzed.
15. This plan establishes the following priorities for disposal of lands and resources (disposal is defined as the transfer of public lands out of BLM administration and includes sales and exchanges, R&PP sales and leases, indemnity selection, and transfer to another Federal trustee):
 - Bureau of Land Management exchange base lands;
 - Other Federal agencies;
 - State agencies;
 - Local governments;
 - Individuals;
 - Any other person (corporations).
16. BLM will continue to cooperate with the California Department of Fish and Game with regard to Deer Herd Management Plans.
17. Site-specific inventories and analyses for threatened and endangered (T&E) species, historic properties (cultural resources), and mineral values are required prior to disposal of public lands and interests.
18. Public lands not discussed in this document, but which are later identified because of survey error or through resurvey, will follow the resource condition objectives and land use allocations as specified for the management area.

AREAWIDE DECISIONS

1. No public lands in the planning area are suitable or available for agricultural entry, including Indian Allotment (43 CFR 2530), because of the rugged topography, small tract size, unsuitable soils, and lack of access. No public lands are desert in character (43 CFR 2520); therefore, no public lands are available for disposal under the desert land laws.
2. Unless specifically prohibited by the proposed action, all public lands (including mineral reserve lands) are available for mineral leasing and mineral material sales, and are open to entry under the Mining Law of 1872.

DETERMINATIONS NOT MADE IN THIS PLAN

Bureau planning guidance requires certain decisions to be made during the land use planning process unless they can be derived from other decisions, the resource is not present in the area or has no interest, or if such a decision would be premature at this time. The following determinations meet one or more of these conditions and are, therefore, not addressed in this plan.

1. Access Routes. Specific access routes have not been identified, but access which is necessary to meet the resource condition objectives and fully implement the land use allocations will be acquired.
2. VRM Class. Due to the scattered nature and remoteness of the BLM landscape, visual resource management classes are considered to be inventory standards rather than planning decisions; VRM classes will be determined on a site-specific basis through standard VRM inventories, and contrast ratings will be used to mitigate projects which may significantly impact visually sensitive areas.
3. Right-of-Way. Rights-of-way determinations cannot be made at this planning level with any degree of credibility. Federal tracts do not control rights-of-way such as highways or utility corridors. Proposals will be addressed on a site-specific basis.
4. Fire. Due to the scattered nature, remoteness, and the relative inaccessibility of the public lands, the California Department of Forestry is responsible for general fire suppression. Deviations from CDF's fire policy will be made on a site-specific basis (wilderness, ACECs). Prescribed fire is generally allowed and will be addressed on a site-specific basis through the demands of resource objectives.
5. Air Quality. BLM must secure permits from State and local agencies for projects impacting air quality. No specific decisions will be made in this plan.
6. Soil and Water Resources. Decisions regarding soil and water objectives will not be made in this plan. Best Management Practices (BMPs) such as the operating parameters for the SYU 13 and Yokayo Grazing Management Records of Decision will determine general soil and water objectives.
7. Historic Properties. Cultural resource values will be assessed on a site-specific basis, generally in response to other resource objectives. All Bureau actions

will comply with the National Historic Preservation Act (1966) for the protection of significant cultural resources. An appropriate level of inventory will be done for all actions with a potential to effect these resources. The Bureau will also make a reasonable and good faith effort to identify and consider contemporary Native American concerns where projects might affect socio-cultural and religious values.

8. Minerals Management. Due to the scattered nature of public land, low economic mineral potential, and lack of interest in mineral development within the resource area, restrictions and stipulations for mineral development will be determined on a case by case basis. The process for reviewing hardrock mineral development proposals will include considerations of California's Surface Mining and Reclamation Act (SMARA), and associated coordination with "lead agencies" as defined by SMARA.

CHAPTER 2

ALTERNATIVES

CHAPTER 2

ALTERNATIVES INCLUDING THE PROPOSED ACTION

Since the pattern of future actions within the Resource Area cannot be predicted with certainty, we have made projections of management actions to allow the analysis of impacts under the various alternatives. These projections are the basis of the impacts identified in this EIS. They represent reasonably feasible patterns of activities which could occur under the alternatives analyzed. The alternatives were developed for each Management Area (MA) by a core planning team, based on the issues and goals listed in Chapter 1, guided by the alternative formulation criteria and making full use of public consultation, coordination with other agencies, and evaluation by District resource specialists. Only significant issues were addressed.

One scenario for each management area is identified as the proposed action--the array of the seven individual selections constitutes the Proposed Resource Management Plan. The rationale for selecting a particular alternative is explained after all of the alternatives are presented. The rationale takes into account the specific features of the management areas, the overall management of the Resource Area, and the regional and statewide perspectives on BLM resources. Thus, one area may have consumptive uses emphasized to balance resource use and demands against an area to be managed in a more restrictive manner. This helps to ensure that the resources will be managed to maximize all public benefits.

Since the release of the Draft Environmental Statement, a number of changes have been made to the text and are incorporated in the descriptions of the alternatives for each management area that follow. A summary of the more substantive changes can be found on the ALTERNATIVE DESCRIPTIONS pages that precede each management area write-up in this chapter.

ALTERNATIVE DEFINITIONS

Alternatives were developed for each management area based on the resource values and issues. Alternatives were developed to provide management options which address the critical issues only. Resource and land use allocations which are not related to the critical issues are also part of the management scenario and are common features among the alternatives.

The Proposed Action is the Bureau's "preferred alternative" and is used interchangeably throughout this document.

NO ACTION ALTERNATIVE

The NO ACTION ALTERNATIVE is defined as the continuation of the present situation. For the purposes of a land use plan it is the continuation of the current level, intensity, direction, or systems of resource use and protection; it is not a static condition or point in time but a logical progression.

ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE

Six of the seven management areas have an ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE which proposes disposal and consolidation of Federal interests managed by the BLM. This alternative gives the BLM the opportunity to consolidate Federal interests for more effective and efficient management and to settle the outstanding indemnity to the State of California.

ENHANCEMENT OF NATURAL VALUES ALTERNATIVE

This alternative emphasizes protection and enhancement of natural values, or aspects of lands and resources which are generally nonconsumptive or passive uses. This does not mean that consumptive uses are prohibited; all uses which are compatible with the resource condition objectives are considered.

EMPHASIZE CONSUMPTIVE RESOURCE USES (TIMBER, RECREATION)

This option emphasizes consumptive land uses such as intensive timber production and consumptive recreation (off-road vehicles). This does not imply that natural values are ignored; all uses which are compatible with the resource condition objectives are considered when developing the management scenario.

MANAGEMENT AREAS

For effective analysis and alternative development, seven management areas have been delineated (Map 1-1). A management area is an area of similar demand, resource potential, problems, or management direction. Delineation of MAs helps to focus the planning effort on the issues germane to a particular area.

SAMOA PENINSULA: Covers two tracts of public land totaling 370 acres where demands for ORV use compete with sensitive dune vegetation and wetlands.

LACKS CREEK: This area contains approximately 4,500 acres of public land in the Redwood Creek watershed (Redwood National Park Protection Zone), has value for timber management, and has some old-growth characteristics. Limited public land consolidation has occurred. State Lands Commission has expressed interest in acquiring these blocks. It also includes about 500 acres of Federal mineral estate.

BUTTE CREEK: This area encompasses 2,500 acres of public land and has significant spotted owl habitat (four known pair of spotted owls) and other old-growth values, and has high value for timber production. State Lands Commission has expressed interest in acquiring these lands as a high priority. Also includes 1,500 acres of mineral estate.

KING RANGE VICINITY: The area totals about 3,900 acres of recently acquired land and tracts between the King Range and Mattole River. The issue of land tenure, where to best consolidate Federal lands and resources, is relevant to the King Range Vicinity. This area requires formal decisions to ensure some consistency with land management themes within the King Range National Conservation Area. The area also includes about 3,200 acres of mineral estate.

RED MOUNTAIN: The area contains approximately 34,300 acres of public land and 14,000 acres of mineral estate. Some old-growth values exist that may conflict with timber management; opportunities exist for consolidation and disposal. State Lands Commission has expressed interest in acquiring some of these tracts.

COVELO VICINITY: Public lands have historically been used for timber production. State Lands Commission has recently acquired large tracts within this management area; sensitive species exist. Opportunities exist for administrative adjustments with the U.S. Forest Service and others for more efficient management of Federal interests. Includes 66,500 acres of public land and 30,000 acres of Federal mineral estate.

SCATTERED TRACTS: Consists of 15,500 acres of public land and 82,800 acres of mineral estate. Several tracts scattered from San Francisco to the Oregon border have limited value for old-growth characteristics and timber production. Historically, because of the difficulty and expense of BLM management, scattered tracts have been used as exchange base lands for consolidation of higher priority Federal lands such as the King Range National Conservation Area, the Cache Creek area in the Clear Lake Resource Area, and lands within wilderness study areas in the California Desert National Conservation Area.

ORGANIZATION OF ALTERNATIVE SCENARIOS

The descriptions of the alternatives consist of three planning elements:

Resource Condition Objectives:

These are the major "themes" which guide management of the specific areas. They are necessary to develop land use allocations and to address unforeseen proposals.

Land Use Allocations:

These are the general quantifications of allowable land and resource uses.

Management Actions:

These are not land use decisions; these are general implementation actions which:

1. Ensure planning objectives are met.
2. Ensure necessary refinements to the plan are being made.
3. Guide BLM budgeting and programming. Management Actions alert the public to specific follow-up actions necessary to implement the plan, so everyone is aware of the costs, complexity, time constraints, and other requirements to realizing the plan objectives. There is no intent to provide a comprehensive list of management actions at this time; actions, priorities, and schedules will be added, deleted, or modified during the useful life of this plan.

ALTERNATIVE DESCRIPTIONS

MANAGEMENT AREA: SAMOA PENINSULA

Four alternatives were generated for this management area. They provide decision makers a range of realistic and distinct options relating to the significant issues: sensitive dune ecosystems and off-road vehicle use.

1. No Action. The continuation of present management consists of both protection of dune ecosystems and provisions for controlled ORV use using State of California "Green Sticker" funding. This is the proposed action.
2. Enhancement of Natural Values. Emphasizes protection of the dune ecosystems by designating both public land parcels as a Research Natural Area/Area of Critical Environmental Concern. Assumes that the protection and study of natural values are more critical than providing any ORV opportunities in the area (excluding a 125-acre ORV riding area).
3. Recreation Enhancement Values. Emphasizes controlled ORV use on the peninsula. Assumes that ORV opportunities are limited on the north coast and that sensitive dune ecosystems are adequately protected on private land (for example: Lanphere-Christensen Dunes Preserve of The Nature Conservancy).
4. Administrative Adjustments. Recognizes extremely limited Federal resource interest in the area, and proposes disposal of public lands to improve Federal management efficiencies. Assumes that excellence in resource protection and enhancement can be effected through disposal to selected entities, and that more significant Federal interests lie elsewhere.

Since the release of the DEIS, several management actions have been carried out within this management area. They include: 1) acquisition of 42 acres on the south side of the Manila Dunes parcel; 2) fencing of 25 acres of foredunes on Manila Dunes for research by Humboldt State University; 3) establishment of a technical review team to provide BLM management information for Manila Dunes; and 4) construction of the Samoa Dunes ORV Park (wetlands protection fence, riding trails, staging area, etc.). All of these actions are consistent with present management objectives for this area.

During the review period for this Resource Management Plan Humboldt County started an ORV Use Plan for the North Spit of Humboldt Bay which includes both the Manila and Samoa Dunes area. The BLM has a mandate to design their management objectives to conform with local government management objectives whenever possible. Therefore, the decision on extent of ORV use on BLM public lands at Samoa/Manila will be based on the County ORV Use Plan after it is completed. If the actions outlined in the County's ORV Use Plan vary significantly from the Bureau Off-Road Vehicle Plan an amendment to the RMP will be prepared and an appropriate level of environmental analysis will be conducted.

All land use allocations, management actions, affected environmental and environmental consequences have been corrected to reflect these changes. The acquisition of the 42 acres as outlined above has increased the size of the management area from 370 acres to 412 acres. The narrow corridor described in the DEIS has been eliminated since the 42 acre acquisition and ORV use has been confined to 47 acres of open sand dunes. The remaining 65 acres has been closed to ORV use.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: NO ACTION/PROPOSED (Continuation of Present Management)

RETAIN: 412 acres

ACQUIRE: 0 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

Samoa Dunes:

1. Provide opportunities for off-road vehicle recreation.
2. Protect specific populations of Menzies' wallflower (*Erysimum menziesii*), coastal wetlands and other natural values.
3. Provide opportunities for other nonconsumptive recreational uses (hiking, sightseeing, birdwatching, picnicking).

Manila Dunes:

1. Enhance natural values.
2. Facilitate research and educational uses of unique dune ecosystems.
3. Provide limited opportunities for off-road vehicle recreation.

II. LAND USE ALLOCATIONS (See Map 2-1)

1. Public lands are not available for disposal. Cooperative management agreements with local government or interest groups may be acceptable.
2. Sensitive species will be protected according to the BLM Sensitive Species Policies (see Appendices 2-3 and 2-4).
3. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Samoa Dunes: 175 acres - CLOSED
125 acres - OPEN

Manila Dunes: 65 acres - CLOSED
47 acres - OPEN

4. Develop ORV park (staging area, riding trails, etc.) on the Samoa Dunes (see Appendix 3-1).
5. Designate all 112 acres of the Manila Dunes as Outstanding Natural Area (ONA) and Area of Critical Environmental Concern (ACEC) for protection and interpretation of natural values. Allows for limited, controlled ORV use.

T. 6 N., R. 1 W., HM, Sections 26, 27, 34, 35.

No Special Designations for Samoa Dunes parcel.

6. Entire management area is CLOSED to firearms shooting.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: NO ACTION/PROPOSED (Continuation of Present Management)

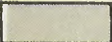
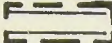
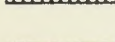
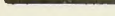
II. LAND USE ALLOCATIONS (CONT.)

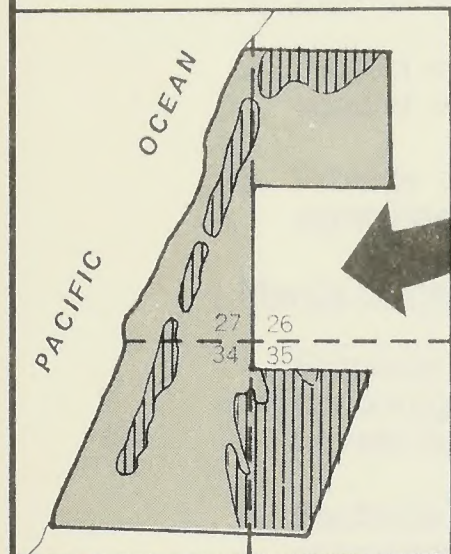
7. Public lands are not available for mineral material sales.
8. Public land is not available for livestock grazing.
9. Forty acres on Samoa Dunes are available for temporary use on a periodic basis by the U. S. Army Corps of Engineers for jetty construction and maintenance.

III. MANAGEMENT ACTIONS

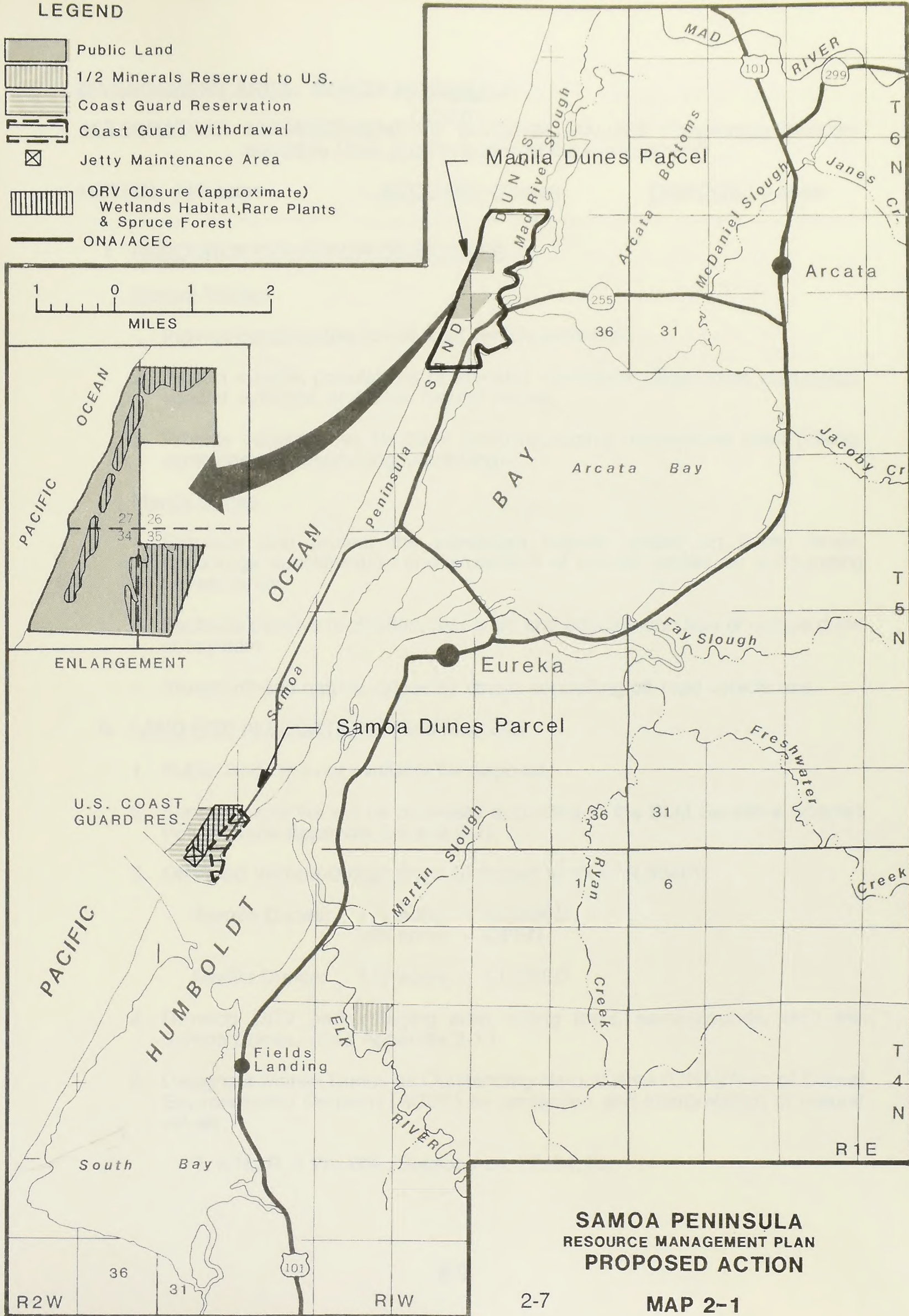
1. Federal Register notices:
 - a. ORV designations;
 - b. ONA/ACEC designation.
2. Prepare an ACEC activity plan for Manila Dunes after completion of county plan.
3. Continue to apply for "Green Sticker" funds for Samoa Dunes.
4. Monitor cultural resources and Menzies' wallflower.
5. Contact universities, local schools, and The Nature Conservancy for expression of interest in research and cooperative management of the Manila Dunes.
6. Continue to seek local government assistance for management.
7. Post boundaries.

LEGEND

-  Public Land
-  1/2 Minerals Reserved to U.S.
-  Coast Guard Reservation
-  Coast Guard Withdrawal
-  Jetty Maintenance Area
-  ORV Closure (approximate)
-  Wetlands Habitat, Rare Plants & Spruce Forest
-  ONA/ACEC



ENLARGEMENT



SAMOA PENINSULA RESOURCE MANAGEMENT PLAN PROPOSED ACTION

MAP 2-1
(BACK)



MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Protection of the Environment)

RETAIN: 412 acres

ACQUIRE: 0 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

Samoa Dunes:

1. Provide opportunities for off-road vehicle recreation.
2. Protect specific populations of Menzies' wallflower (*Erysimum menziesii*), coastal wetlands, and other natural values.
3. Provide opportunities for other nonconsumptive recreational uses (hiking, sightseeing, birdwatching, picnicking).

Manila Dunes:

1. Enhance and protect the significant natural values on public lands; encourage consideration and protection of natural values on surrounding private lands.
2. Facilitate passive recreation, research, and educational uses of unique dune ecosystem.
3. Protect off-site natural values by strictly controlling off-road vehicle use.

II. LAND USE ALLOCATIONS (See Map 2-2)

1. Public lands are not available for disposal.
2. Sensitive species will be protected according to the BLM Sensitive Species Policies (see Appendix 2-3 and 2-4).
3. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Samoa Dunes: 175 acres - CLOSED
125 acres - OPEN

Manila Dunes: 112 acres - CLOSED

4. Develop ORV park (staging area, riding trails, campgrounds, etc.) the Samoa Dunes. (See Appendix 3-1.)
5. Designate Manila Dunes as Outstanding Natural Area (ONA)/Area of Critical Environmental Concern (ACEC) for protection and interpretation of natural values.

T. 6 N., R. 1 W., HM., Sections 26, 27, 34, 35.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Protection of the Environment)

RETAIN: 412 acres

ACQUIRE: 0 acres

DISPOSE: 0 acres

II. LAND USE ALLOCATIONS (CONT.)

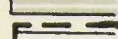
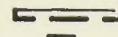
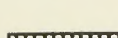
No Special Designations for Samoa Dunes parcel.

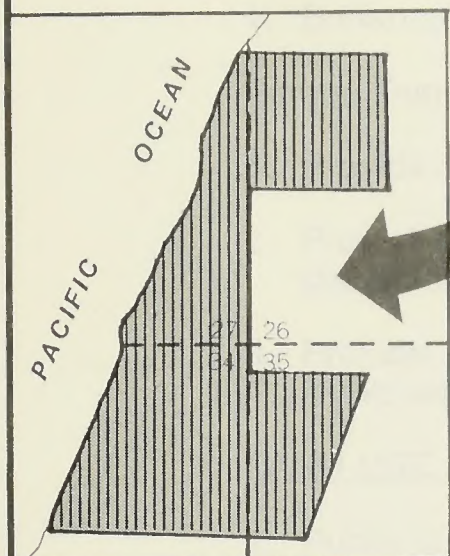
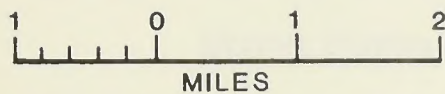
6. Public lands are CLOSED to firearms shooting, but open to other forms of dispersed unstructured recreation that do not interfere with research or educational values.
7. Public lands are not available for material sales.
8. Public lands are not available for livestock grazing.
9. Forty acres on Samoa Dunes are available for use by the U.S. Army Corps of Engineers for jetty construction and maintenance. Other rights-of-way are not affected.

III. MANAGEMENT ACTIONS

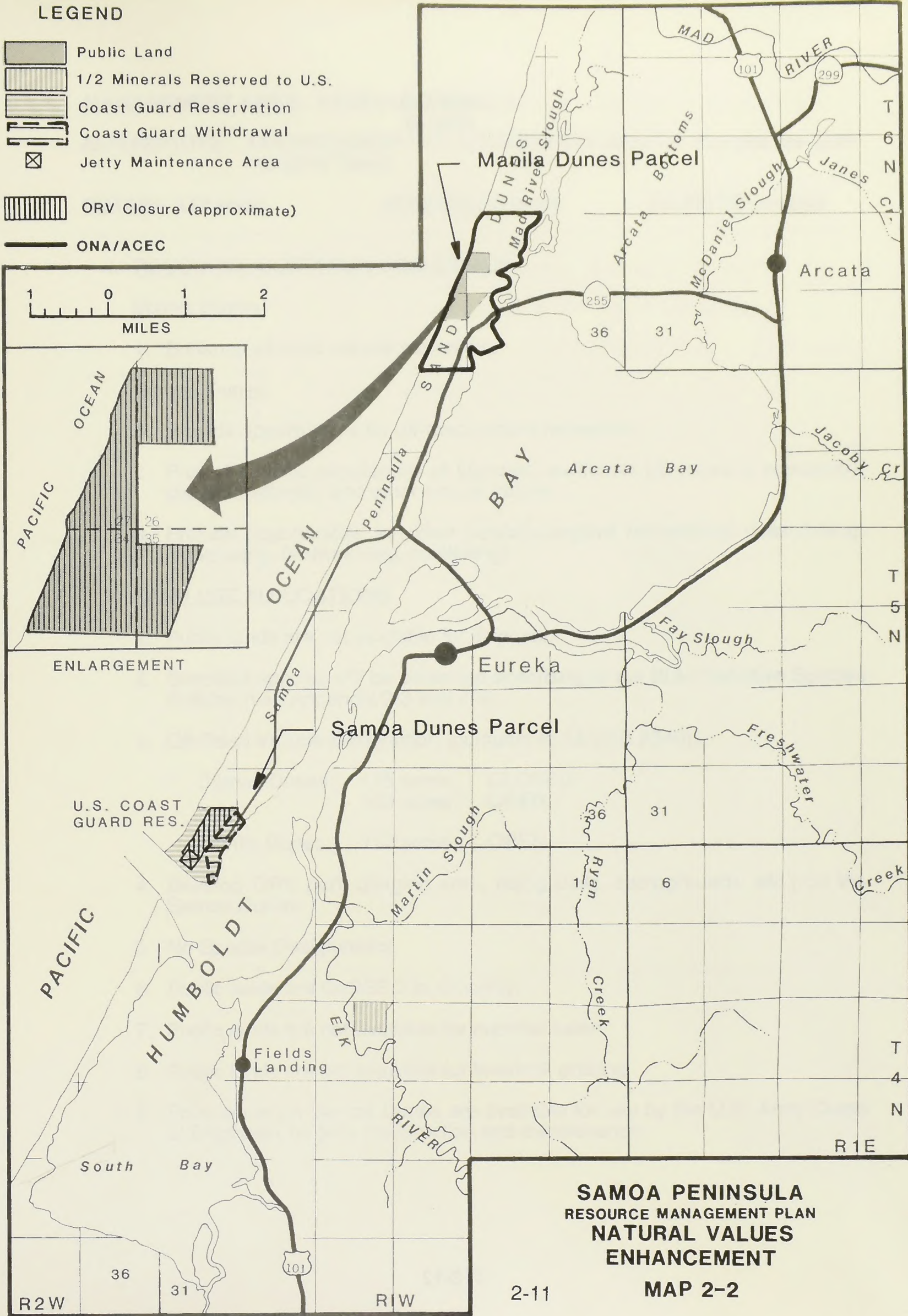
1. Federal Register notices:
 - a. ORV designations;
 - b. ONA/ACEC designation.
2. Prepare an ONA/ACEC activity plan for Manila Dunes after completion of county plan.
3. Continue to apply for "Green Sticker" funds for Samoa Dunes.
4. Monitor cultural resources and Menzies' wallflower.
5. Contact universities, local schools, and The Nature Conservancy for expression of interest in research and cooperative management of the Samoa Peninsula.
6. Continue to seek local government assistance for management.
7. Post boundaries.

LEGEND

-  Public Land
-  1/2 Minerals Reserved to U.S.
-  Coast Guard Reservation
-  Coast Guard Withdrawal
-  Jetty Maintenance Area
-  ORV Closure (approximate)
-  ONA/ACEC



ENLARGEMENT



SAMOA PENINSULA RESOURCE MANAGEMENT PLAN NATURAL VALUES ENHANCEMENT

2-11

MAP 2-2

MAP 2-2
(BACK)



MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ENHANCEMENT OF RECREATION VALUES (Emphasize Consumptive Uses)

RETAIN: 412 acres

ACQUIRE: 0 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

Manila Dunes:

1. Enhance off-road vehicle recreation.

Samoa Dunes:

1. Provide opportunities for off-road vehicle recreation.
2. Protect specific populations of Menzies' wallflower (*Erysimum menziesii*), coastal wetlands, and other natural values.
3. Provide opportunities for other nonconsumptive recreational uses (hiking, sightseeing, birdwatching, picnicking).

II. LAND USE ALLOCATIONS

1. Public lands are not available for disposal.
2. Sensitive species will be protected according to the BLM Sensitive Species Policies (see Appendix 2-3 and 2-4).
3. Off-Road Vehicle Designation (pursuant to 43 CFR 8340):
 - Samoa Dunes: 175 acres - CLOSED
125 acres - OPEN
 - Manila Dunes: 112 acres - OPEN
4. Develop ORV park (staging area, riding trails, campgrounds, etc.) on the Samoa Dunes.
5. No Special Designations.
6. Public lands are CLOSED to shooting.
7. Public lands are not available for material sales.
8. Public lands are not available for livestock grazing.
9. Forty acres on Samoa Dunes are available for use by the U.S. Army Corps of Engineers for jetty construction and maintenance.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ENHANCEMENT OF RECREATION VALUES (Emphasize Consumptive Uses)

RETAIN: 412 acres

ACQUIRE: 0 acres

DISPOSE: 0 acres

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations.
2. Monitor cultural resources and Menzies' wallflower.
3. Sign entrance to blocks regarding ORV designations.
4. Post boundaries.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 130 acres

ACQUIRE: 0 acres

DISPOSE: 282 acres

I. RESOURCE CONDITION OBJECTIVES

1. Provide opportunities for a wide range of coastal dependent recreational activities including off-road-vehicle recreation.
2. Protect specific populations of Menzies' wallflower (*Erysimum menziesii*), coastal wetlands, and other natural values.
3. Facilitate research and educational uses of unique dune system.
4. Satisfy local community-based recreational and other public purpose needs.

II. LAND USE ALLOCATIONS

1. Disposal of 170 acres of public lands on the Samoa Dunes portion of the management area and the 112-acre Manila Dunes portion to an entity able to fulfill the Resource Condition Objective above.
2. Retain 130 acres on the Samoa Dunes currently withdrawn to the U.S. Coast Guard.
3. Protect sensitive species according to the BLM Sensitive Species Policies (see Appendices 2-3 and 2-4).
4. Off-Road Vehicle Designation (pursuant to 43 CFR 8340):

Samoa Dunes: 175 acres - CLOSED
125 acres - OPEN

Manila Dunes: 65 acres - CLOSED
47 acres - OPEN

5. Develop ORV park (staging area, riding trails, etc.) on the Samoa Dunes (see Appendix 3-1).
6. Designate Manila Dunes as an Outstanding Natural Area (ONA)/Area of Critical Environmental Concern (ACEC) for protection and interpretation of natural values.

T. 6 N., R. 1 W., HM, Sections 26, 27, 34, 35

No Special Designations for the Samoa Dunes parcel.

7. Public lands are CLOSED to firearms shooting, but OPEN to other forms of dispersed, instructional recreation that do not interfere with research or educational values.

MANAGEMENT AREA: SAMOA PENINSULA

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 130 acres

ACQUIRE: 0 acres

DISPOSE: 282 acres

II. LAND USE ALLOCATIONS (CONT.)

8. Public lands are not available for material sales.
9. Public lands are not available for livestock grazing.
10. Forty acres on Samoa Dunes are available for temporary use on a periodic basis by the U.S. Army Corps of Engineers for jetty construction and maintenance.

III. MANAGEMENT ACTIONS

1. Contact potential entities about disposal:
 - a. U.S. Fish and Wildlife Service;
 - b. California Department of Parks and Recreation;
 - c. Humboldt State University;
 - d. Local Schools;
 - e. City of Eureka;
 - f. The Nature Conservancy;
 - g. Humboldt Bay Harbor Recreation and Conservation District;
 - h. Humboldt Bay Maritime Museum, Inc.
2. Develop a plan of disposal; prepare Land Report.
3. Federal Register notices:
 - a. ORV designations;
 - b. ONA/ACEC designation.
4. Prepare ONA/ACEC activity plan for Manila Dunes after completion of county plan.
5. Continue to apply for "Green Sticker" funds for Samoa Dunes.
6. Monitor cultural resources and Menzies' wallflower.
7. Continue to post boundary, regulation, and information signs.

Rationale for the Proposed Action

The NO ACTION ALTERNATIVE is the PROPOSED ACTION.

Samoa Dunes. The Samoa Dunes Off-Road Vehicle Plan was completed in 1982. The objective was to regulate and manage ORV use by segregating recreational uses into zones to limit use conflicts. The majority of the project is to be funded through the California Off-Highway Motor Vehicle Division.

This plan will protect the unique biotic and wetland values, while at the same time allow for ORV use and other more passive recreational activities. A 40-acre portion of the area has already been fenced to protect the existing Menzies' wallflower habitat. Design plans for the area have already been completed.

Manila Dunes. This area is unique both to BLM and to California. It contains active and stabilized sand dunes, wetlands, and sensitive plants. This area is only a few miles from Arcata and Eureka and will provide an outstanding opportunity for environmental education through the local schools and Humboldt State University.

Much of this area is being used by ORVs . This use has caused extensive damage to the dune communities throughout the area. This type of use is unacceptable in such a sensitive area and, therefore ORV use will be confined to 47 acres of mostly unvegetated sand dunes. Approximately 65 acres of foredune habitat and spruce forest will be closed to all ORV use.

Because of its unique natural values this area will be designated as an ACEC. The area itself will be managed through cooperative agreements with Louisiana-Pacific and The Nature Conservancy (TNC). We hope to use TNC and Humboldt State students to develop a plan for the area and to do much of the on-the-ground work.

An activity plan for the Samoa Peninsula will be prepared after the completion of the regional wide county plan for the coastal dune areas. Management direction and all on-the-ground activities on the Peninsula will be consistent with this plan.

MANAGEMENT AREA: LACKS CREEK

Four alternatives were generated for this management area. They provide decision makers a range of realistic and distinct options relating to the significant issues: State of California indemnity selections, old-growth forest characteristics, and timber production.

1. Timber Production. Emphasizes timber management and consolidation of public land to improve management efficiencies as well as protection of old-growth characteristics. This is the proposed action.
2. No Action. This continuation of the present situation effects a level of both timber management and protection of old-growth characteristics.
3. Enhancement of Natural Values. Emphasizes protection and enhancement of old-growth forest characteristics. Assumes protection of an old-growth island within the area is critical.
4. Administrative Adjustments. Recognizes interest for acquisition by State Lands Commission and opportunity for disposal to improve Federal management efficiencies. Assumes that excellence in resource protection and enhancement can be effected through disposal to selected entities.

This management area originally contained an 1800-acre old-growth reserve candidate. The 1982 Management Framework Plan (MFP) established a reserve in the northern portion of the management area only, approximately 800 acres. However, the Draft RMP/EIS incorrectly identified the 1800-acre reserve to be designated as an old-growth ACEC in the No Action and Enhancement of Natural Values Alternatives. The Final RMP/EIS is corrected to show an 800-acre ACEC designation for each alternative except the Administrative Adjustment Alternative. All resource condition objectives, land use allocations, management actions and environmental consequences have been corrected to reflect this change, including timber production base and allowable cut calculations.

MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: TIMBER PRODUCTION/PROPOSED (Emphasize Consumptive Resource Uses)

RETAIN: 4,500 acres surface
500 acres subsurface

ACQUIRE: 1,800 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Increase timber production through intensive management practices, except as noted in No. 4 below.
2. Provide minor forest products (firewood, seeds, poles, etc.) to the market.
3. Improve cost effectiveness of public land management by consolidation of ownership.
4. Protect old-growth values within the 800-acre RNA/ACEC.

II. LAND USE ALLOCATIONS (See Map 2-3)

1. Public lands are not available for disposal.
2. Pursue acquisition of 1,800 acres of high site, well-stocked commercial forest land within the management area for timber management.
3. Manage area for various forest products. Harvest an average of 0.5 MMBF per year from the available forest land. About 200 acres of streamside buffers and old-growth reserve areas will be removed from the suitable CFL of 3,300 acres for a net available CFL of about 3,100 acres.

Tree planting, brush and hardwood release and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. Designate an 800-acre old-growth reserve as a Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of old-growth values.

T. 8 N., R. 3 E., Portions of Secs. 22, 23, 26 & 27 as noted on Lacks Creek Map 2-3.

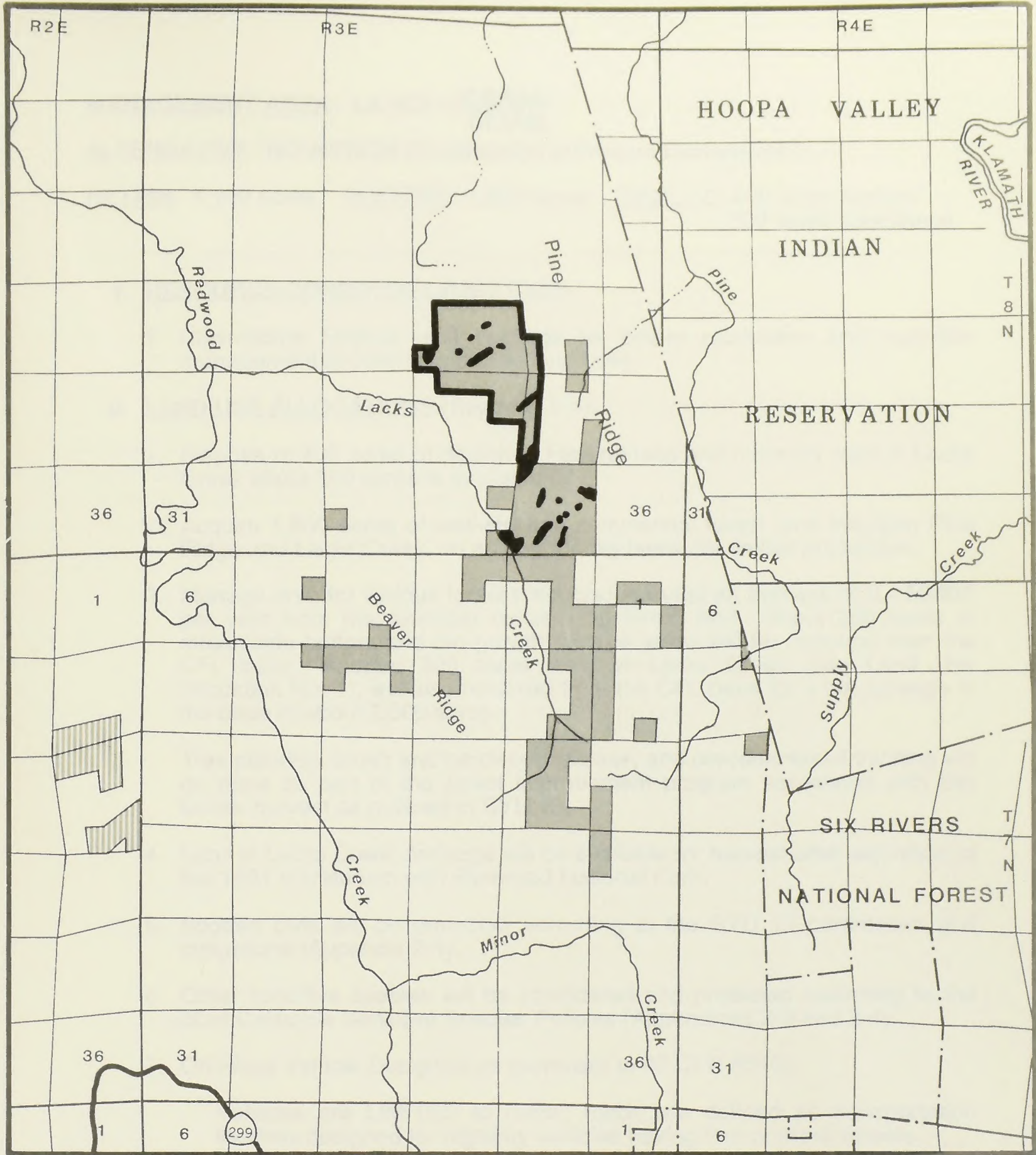
6. Public lands are available for dispersed recreation.

MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: TIMBER PRODUCTION/PROPOSED (Emphasize Consumptive Resource Uses)

III. MANAGEMENT ACTIONS

1. Prepare a Watershed Activity Plan to reflect (not exclusively):
 - a. Monitoring of Redwood Creek in conjunction with Redwood National Park;
 - b. Rehabilitation of Lacks Creek drainage;
 - c. Fire management--including suppression.
2. Include this management area in timber management/rehabilitation plans. Logging will begin after the 1991 moratorium with Redwood National Park. Prepare a new computer run to refine the annual allowable cut.
3. Federal Register notices:
 - a. ORV designations;
 - b. ACEC designation.
4. Sign entrance to public lands regarding ORV designations.
5. Acquire nonexclusive/permanent access to all public land without access for timber production and protection.
6. Contact surrounding landowners about acquisition (re: Land Use Allocation No. 2).
7. Prepare Land Report(s) to address:
 - a. Specific acquisition methods (regarding No. 6 above);
 - b. Site-specific requirements and problems.
8. Monitor spotted owls.
9. Post boundaries.



LEGEND

- Public Land
- Minerals Reserved to U.S.
- "Old-growth" Timber Stand
- RNA/ACEC



MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: NO ACTION (Continuation of Present Management)

RETAIN: 4,100 acres **ACQUIRE:** 1,800 acres **DISPOSE:** 400 acres surface
500 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Consolidate Federal land holdings for timber production and custodial management of other compatible land uses.

II. LAND USE ALLOCATIONS (See Map 2-4)

1. Dispose of 400 acres of detached Federal land and minerals west of Lacks Creek about 300 acres is available CFL.
2. Acquire 1,800 acres of well-stocked commercial forest land between Pine Ridge and Lacks Creek, on an opportunity basis, for timber production.
3. Manage area for various forest products. Harvest an average of 0.4 MMBF per year from the available commercial forest land. About 200 acres of streamside buffers and old-growth reserve areas will be removed from the CFL base. Another 300 acres west of Lacks Creek (see Land Use Allocation No. 1), will also removed from the CFL base for a net acreage in the base of about 2,800 acres.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

4. Land in Lacks Creek drainage will be available for harvest after expiration of the 1991 moratorium with Redwood National Park.
5. Spotted owls will be protected according to the SYU 13 parameters and mitigations (Appendix 2-1).
6. Other sensitive species will be considered and protected according to the BLM California Sensitive Species Policies (Appendices 2-3 and 2-4).
7. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

8. Designate the 800-acre candidate old-growth reserve as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of old-growth values.

T. 8 N., R. 3 E., HM, Sections 22, 23, 26, 27 as noted on Lacks Creek Map 2-4.

MANAGEMENT AREA: LACKS CREEK

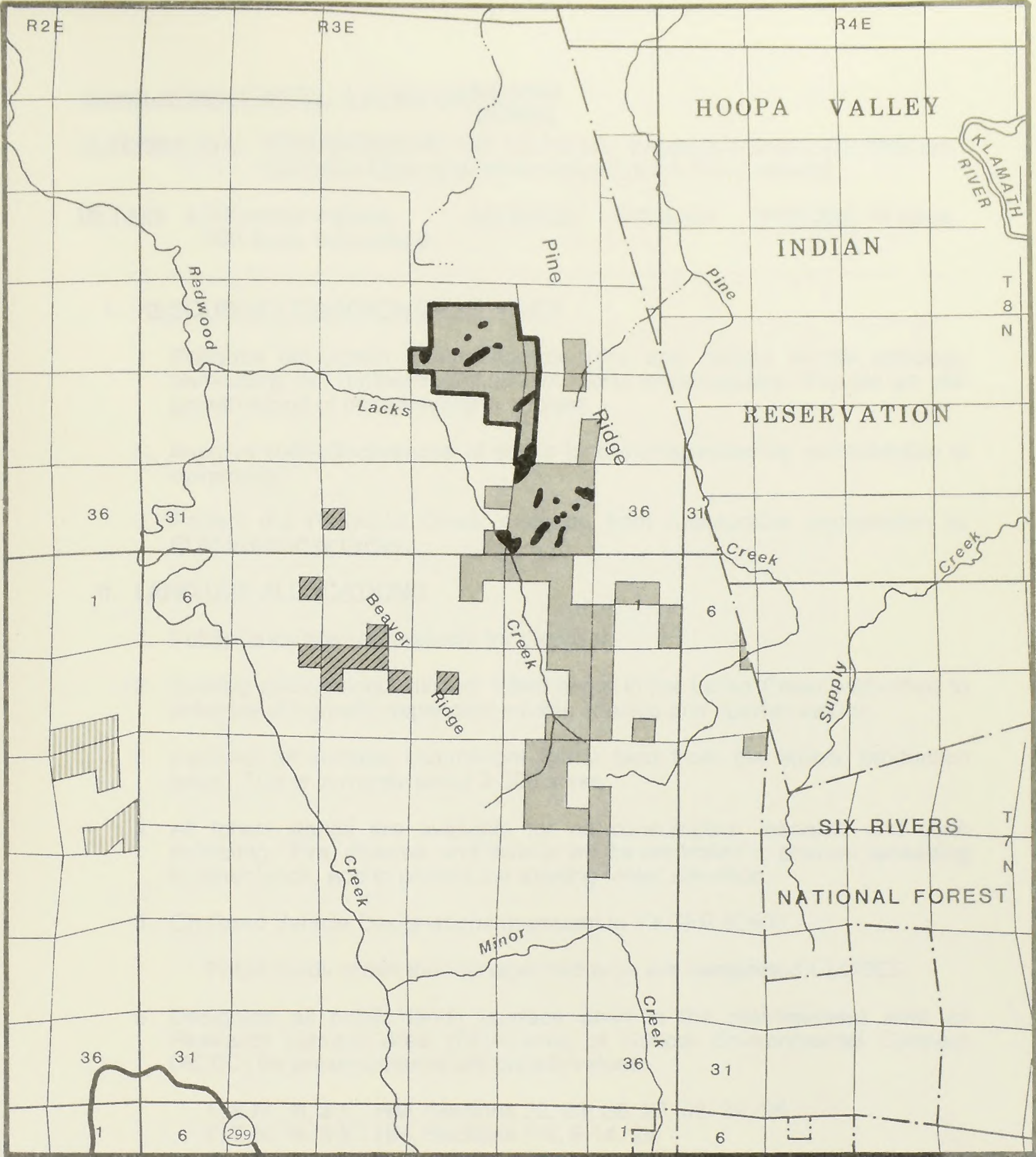
ALTERNATIVE: NO ACTION (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

9. Public lands are available for dispersed, unstructured recreation.
10. The RNA/ACEC is not available for mineral material sales.
11. The RNA/ACEC is not available for livestock grazing.

III. MANAGEMENT ACTIONS

1. Include Lacks Creek management area in the timber management/rehabilitation plans. Logging will begin in the Lacks Creek watershed after the moratorium ends. Prepare a computer run for the annual allowable cut.
2. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designations.
3. Sign entrance to public lands regarding ORV designations.
4. Acquire nonexclusive/permanent access to all public land for timber production and protection.
5. Monitor spotted owls.
6. Post boundaries.



LEGEND

- Public Land
- Minerals Reserved to U.S.
- RNA/ACEC
- "Old-growth" Timber Stand
- Lands for disposal



LACKS CREEK RESOURCE MANAGEMENT PLAN NO ACTION ALTERNATIVE MAP 2-4

MAP 2-4
(BACK)



MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

RETAIN: 4,500 acres surface
500 acres subsurface

ACQUIRE: 1,800 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Enhance old-growth forest characteristics and related wildlife species--particularly the northern spotted owl (*Strix occidentalis*). Provide an old-growth island of mixed-evergreen forest.
2. Improve cost-effectiveness of public land management by consolidation of ownership.
3. Protect the Redwood Creek drainage from measurable degradation by BLM-initiated activities.

II. LAND USE ALLOCATIONS

1. Public lands are not available for disposal.
2. Actively pursue acquisition of 1,800 acres in the Lacks Creek watershed to enhance old-growth dependent wildlife species and riparian values.
3. Remove all suitable commercial forest land from the timber production base. This is currently about 3,300 acres.
4. All forest stands are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands, and to protect the existing forest condition.
5. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the management area are designated CLOSED.

6. Designate all public lands (surface only) in the management area as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for preservation of old-growth values.

T. 8 N., R. 3 E., HM, Sections 22, 23, 26, 27, 33, 34, 35.

T. 7 N., R. 3 E., HM, Sections 1-5, 8-14, 24

7. Public lands are available for dispersed recreation.
8. Public lands within the RNA/ACEC are not available for mineral material sales.
9. Public lands are not available for livestock grazing.

MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

III. MANAGEMENT ACTIONS

1. Monitor old-growth forest characteristics.
2. Monitor known cultural resources.
3. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
4. Sign entrance to public lands regarding ORV designations.
5. Acquire nonexclusive/permanent access to all public land parcels without access for research, protection, and other administrative needs.
6. Contact universities/research institutions for expressions of interest in conducting research.
7. Contact surrounding landowners about acquisitions (re: Land Use Allocation No. 2).
8. Prepare Land Report(s) to address:
 - a. Specific acquisition methods (regarding management action No. 7);
 - b. Site-specific inventories/requirements.
9. Prepare a Coordinated Resource Management Plan to reflect (not exclusively):
 - a. Monitoring of Redwood Creek with Redwood National Park;
 - b. Rehabilitation of Lacks Creek watershed;
 - c. Fire management--including suppression.
10. Post boundaries.

MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 0 acres

ACQUIRE: 0 acres

DISPOSE: 4,500 acres surface
500 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of Federal interests in areas of high visibility and significant Federal ownership.
2. Satisfy the State of California in-lieu entitlements.

II. LAND USE ALLOCATIONS

1. Dispose of all Federal interests including minerals.
2. Keep all suitable commercial forest land in timber production pending disposal.
3. Public lands are not available for livestock grazing.
4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. No Special Designations.
6. Dispersed recreation is allowed.

III. MANAGEMENT ACTIONS

1. Contact potential selectors for disposal of public lands and resources (not exclusively):
 - a. National Park Service;
 - b. California State Lands Commission;
 - c. Surrounding timber companies;
 - d. Others.
2. Prepare Land Report(s) to address:
 - a. Specific disposal methods and time frames (based on management action No. 1 above);
 - b. Site-specific inventories and requirements:
 - i. Cultural resources;
 - ii. T&E species.

MANAGEMENT AREA: LACKS CREEK

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

III. MANAGEMENT ACTIONS (CONT.)

3. Federal Register notices:

a. ORV Designations.

4. Sign entrance to public lands regarding ORV designations.

Rationale for the Proposed Action

The **TIMBER PRODUCTION ALTERNATIVE** is the **PROPOSED ACTION**.

Approximately 800 acres of this area will be identified as an old-growth reserve area. This will help protect downstream resources on BLM and Redwood National Park land as well as provide a significant amount of old-growth habitat to enhance the Resource Area's old-growth reserve system.

This area contains significant timber values, 32 MMBF of commercial softwoods and over 7,000 cords of fuelwood. It can provide a yield over the first rotation period of 0.5 MMBF per year. The area is readily accessible; most of the necessary road system is in place.

Historically, adjacent landowners have been managing for forest products and have recently expressed interest in selling or exchanging forest land in this area. If other lands in the Resource Area are made available for exchange they should be used to block up the high quality commercial forest lands in this management area.

The Redwood National Park has expressed interest in assisting in acquisition of lands in the Lacks Creek Watershed as part of the Park Protection Zone for Redwood Creek. The lands, if acquired with Land & Water Conservation Funds, would be managed under the Federal Land Policy and Management Act (FLPMA) for multiple use and the protection of downstream resources.

MANAGEMENT AREA: BUTTE CREEK

Five alternatives were generated for this management area. They provide decision makers a range of realistic and distinct options relating to the significant issues: State of California indemnity selections, old-growth forest characteristics, spotted owls, and timber management.

1. Enhancement of Natural Values. Emphasizes protection and enhancement of old-growth mixed evergreen forest characteristics and spotted owl habitat. Proposes designation as a Research Natural Area and Area of Critical Environmental Concern. Assumes that providing an old-growth island and spotted owl habitat in this area is more critical than timber production. This is the proposed action.
2. Timber Production. Emphasize timber management and consolidation of public land to improve efficiencies. Assumes timber is more critical than old-growth characteristics or spotted owl habitat in this particular area.
3. Natural History. Proposes one high-quality old-growth island based on a variety of values, and proposes intensive timber management on a separate tract.
4. No Action. Proposes a mixture of timber management and protection of spotted owl habitat throughout the management area. Assumes timber management and spotted owls can successfully coexist on small tracts of land.
5. Administrative Adjustments. Recognizes interest for acquisition by State Lands Commission and opportunities for disposal to improve Federal management efficiencies. Assumes that excellence in resource protection and enhancement can be achieved through disposal to selected entities and that more significant Federal interests lie elsewhere.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

RETAIN: 2,500 acres surface
1,500 acres subsurface

ACQUIRE: 900 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Enhance old-growth forest characteristics and related wildlife species--particularly the northern spotted owl (*Strix occidentalis*).
2. Improve cost effectiveness of public land management by consolidation of ownership.
3. Enhance riparian condition in Butte Creek.

II. LAND USE ALLOCATION (See Map 2-5)

1. Public lands within the management area are not available for disposal.
2. Actively pursue acquisition of 900 acres of land in the Butte Creek watershed to enhance old-growth dependent wildlife species and riparian condition.
3. Remove all suitable commercial forest land from the timber production base. This is currently about 2,100 acres.
4. All forest stands are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands, and to protect the existing forest.
5. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the management area are designated CLOSED, except for Butte Creek and Larabee Butte access roads, No. 5107 and No. 5112, respectively.

6. Designate all public lands in the management area as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of old-growth values.

T. 1 N., R. 4 E., HM, Sections 17, 20-23, 27, 34, 35.
T. 1 S., R. 4 E., HM, Sections 1, 2, 3.

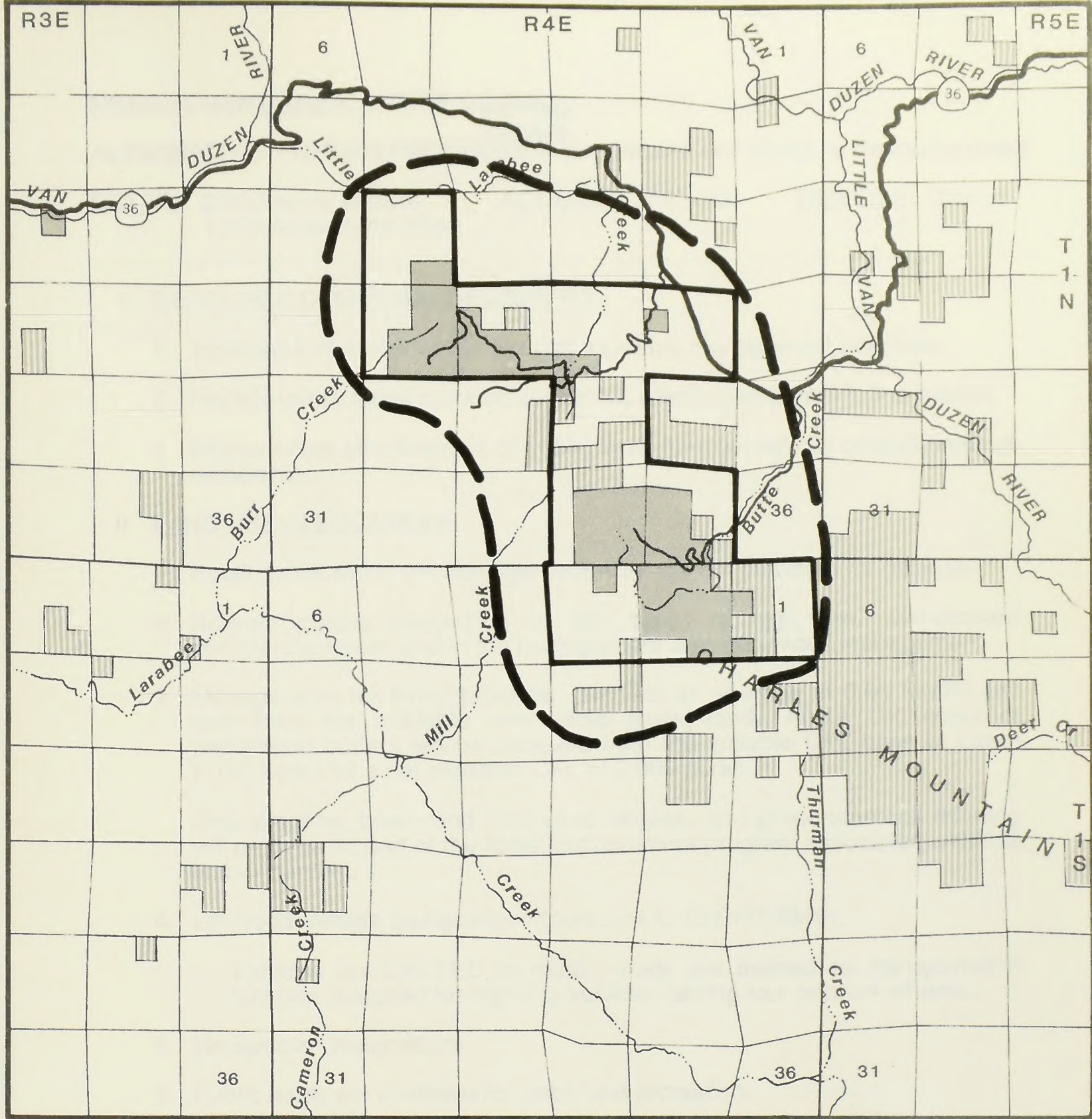
7. Public lands within the RNA/ACEC (including mineral reserve lands) are not available for material sales.
8. Public lands are not available for livestock grazing.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

III. MANAGEMENT ACTIONS

1. Monitor spotted owls and other old-growth characteristics.
2. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
3. Sign entrance to public lands regarding ORV designations.
4. Contact universities/research institutions for expressions of interest in conducting research.
5. Contact surrounding landowners about acquisitions.
6. Prepare Land Report(s) to address:
 - a. Specific acquisition methods (regarding No. 5 above);
 - b. Site-specific inventories/requirements.
7. Prepare a RNA/ACEC Activity Plan.
8. Post boundaries.



LEGEND

- Public Land
- Minerals Reserved to U.S.
- Management Area Boundary
- RNA/ACEC

BUTTE CREEK RESOURCE MANAGEMENT PLAN PREFERRED ALTERNATIVE



MAP 2-5
(BACK)



LEGEND
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UNITED STATES
DEPARTMENT OF AGRICULTURE
BUREAU OF PLANT INDUSTRY

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: TIMBER PRODUCTION (Emphasize Consumptive Resource Uses)

RETAIN: 2,500 acres surface
1,500 acres subsurface

ACQUIRE: 900 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Increase timber production through intensive management practices.
2. Provide minor forest products (firewood, seeds, poles, etc.) to the market.
3. Improve cost effectiveness of public land management by consolidation of ownership.

II. LAND USE ALLOCATIONS

1. Public lands within the Management Area are not available for disposal.
2. Actively pursue acquisition of 900 acres of high site, well-stocked commercial forest land in the management area for timber management.
3. Manage area for forest products. Harvest an average of 0.85 MMBF per year from the available commercial forest land. About 100 acres of streamside buffers will be removed from the suitable CFL base of about 2,100 acres for a net available CFL of 2,000 acres.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest.

4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are **LIMITED** to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. No Special Designations.
6. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Include this management area in timber management and rehabilitation plans. Prepare a computer run to refine the annual allowable cut.
2. Federal Register notices:
 - a. ORV designations.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: TIMBER PRODUCTION (Emphasize Consumptive Resource Uses)

III. MANAGEMENT ACTIONS (CONT.)

3. Sign entrance to public lands regarding ORV designations.
4. Acquire nonexclusive/permanent access where necessary for timber production.
5. Contact surrounding landowners about acquisitions.
6. Prepare Land Report(s) to address:
 - a. Site-specific requirements/problems;
 - b. Specific acquisition methods (regarding No. 5 above).
7. Monitor spotted owls.
8. Post boundaries.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: NATURAL HISTORY (Protect Old-Growth Characteristics and Intensively Manage Timber on Separate Tracts)

RETAIN: 2,500 acres surface
1,500 acres subsurface

ACQUIRE: 1,800 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Enhance old-growth characteristics as defined by old-growth forest characteristics (Appendix 1-1).
2. Provide an old-growth island of mixed-evergreen forest of about 1,235 acres in the Butte Creek block.
3. Consolidate Federal land holdings in the Larabee Butte block for intensive timber production where it does not interfere with Resource Condition Objective No. 1.

II. LAND USE ALLOCATIONS (See Map 2-6)

1. Public lands within the Management Area are not available for disposal.
2. Actively pursue acquisition of 900 acres of land in the Butte Creek watershed to enhance old-growth values.
3. Actively pursue acquisition of 900 acres of high site, well-stocked commercial forest land near the Larabee Butte block for timber production.
4. Remove all suitable commercial forest land in the Butte Creek block from timber production base for preservation of the old-growth characteristics. This is about 1,235 acres.
5. Harvest an annual average of about 0.4 MMBF from the available forest land in the Larabee Butte block. About 40 acres of streamside buffers will be removed from the suitable forest base leaving a net production base of about 825 acres.

Tree planting, brush and hardwood release and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

6. All forest stands within the management area are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands, and to protect the existing forest.
7. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the Butte Creek block of the management area are designated CLOSED.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: NATURAL HISTORY (Protect Old-Growth Characteristics and Intensively Manage Timber on Separate Tracts)

II. LAND USE ALLOCATIONS (CONT.)

Larabee Butte block: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

8. Designate the Butte Creek block as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for preservation of old-growth values.

T. 1 N., R. 4 E., HM, Sections 34, 35, 36.

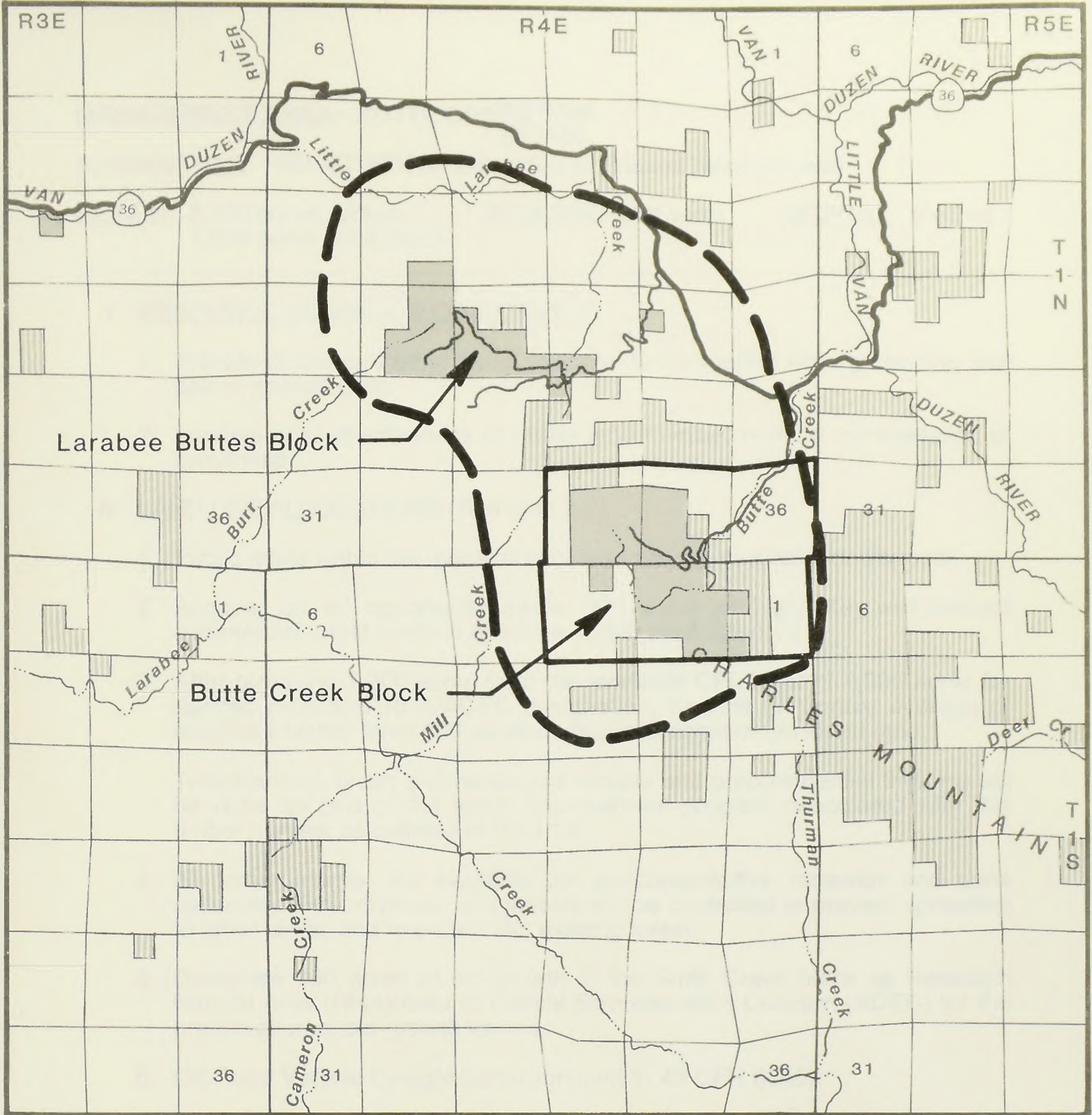
T. 1 S., R. 4 E., HM, Sections 1, 2, 3, 11, and 12.

No Special Designations for Larabee Butte block.

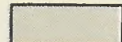
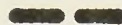
9. Public lands are available for dispersed, unstructured recreation.
10. The Butte Creek RNA/ACEC is not available for mineral material sales.
11. The Butte Creek RNA/ACEC is not available for livestock grazing.

III. MANAGEMENT ACTIONS

1. Monitor spotted owls/old-growth characteristics.
2. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
3. Sign entrance to public lands regarding ORV designations.
4. Contact surrounding landowners about acquisitions.
5. Contact universities/research institutions for expressions of interest in conducting research in the Butte Creek block.
6. Prepare Land Report(s) to address:
 - a. Site-specific requirements/inventories;
 - b. Specific acquisition methods (regarding No. 5 above).
7. Prepare an ACEC Activity Plan for Butte Creek block.
8. Post boundaries.



LEGEND

-  Public Land
-  Minerals Reserved to U.S.
-  Management Area Boundary
-  RNA/ACEC

BUTTE CREEK RESOURCE MANAGEMENT PLAN NATURAL HISTORY ALTERNATIVE

1 0 1 2
MILES

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: NO ACTION (Continuation of Present Management)

RETAIN: 2,500 acres surface
1,500 acres subsurface

ACQUIRE: 900 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Provide timber and other forest products to the market while protecting four pair of spotted owls.
2. Improve cost-effectiveness of public land management by consolidation of ownership.

II. LAND USE ALLOCATIONS (See Map 2-7)

1. Public lands within the management area are not available for disposal.
2. Acquire, on an opportunity basis, 900 acres of high site, well-stocked commercial forest lands to enhance timber production.
3. After removing 1,200 acres from the available CFL base of 2,000 acres for spotted owls and RNA/ACEC designation, harvest an annual average of about 0.4 MMBF from 800 acres of available commercial forest land.

Tree planting, brush and hardwood release and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

4. All forest stands are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands, and to protect the existing forest.
5. Designate 360 acres of old-growth in the Butte Creek block as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of old-growth values.
6. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public Lands within the RNA/ACEC of the management area are designated CLOSED.

Remaining public lands: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

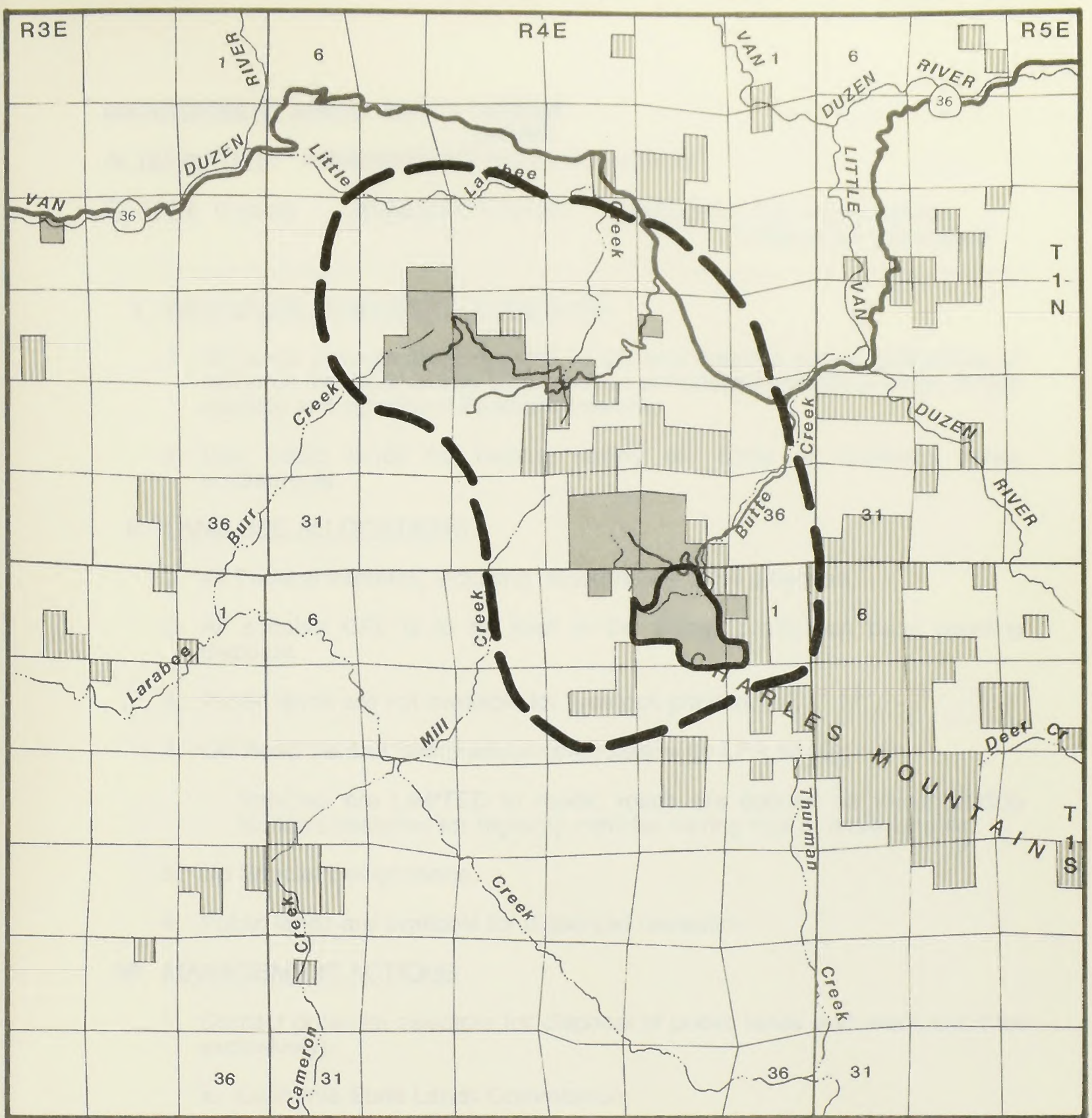
7. Public lands are available for dispersed recreation.
8. The RNA/ACEC is not available for mineral material sales.
9. The RNA/ACEC is not available for livestock grazing.

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: NO ACTION (Continuation of Present Management)

III. MANAGEMENT ACTIONS

1. Prepare a computer run to refine the annual allowable cut.
2. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
3. Sign entrance to public lands regarding ORV designations.
4. Acquire nonexclusive/permanent access where necessary for timber production and protection.
5. Monitor spotted owls and old-growth characteristics.
6. Post boundaries.



LEGEND

- Public Land
- Minerals Reserved to U.S.
- Management Area Boundary
- RNA/ACEC

BUTTE CREEK RESOURCE MANAGEMENT PLAN

NO ACTION ALTERNATIVE



MAP 2-7
(BACK)



Legend

1. [Symbol] [Text]

2. [Symbol] [Text]

3. [Symbol] [Text]

4. [Symbol] [Text]

5. [Symbol] [Text]

Map 2-7 (Back)

Scale 1:50,000

1964 Edition

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 0 acres **ACQUIRE:** 0 acres **DISPOSE:** 2,500 acres surface
1,500 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of Federal interests in areas of high visibility and significant Federal ownership.
2. Use public lands for helping satisfy the State of California in-lieu entitlements.

II. LAND USE ALLOCATIONS

1. All Federal interests, including minerals, are to be disposed.
2. All suitable CFL is to be kept in the timber production base pending disposal.
3. Public lands are not available for livestock grazing.
4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. No Special Designations.
6. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Contact potential selectors for disposal of public lands and resources (not exclusively):
 - a. California State Lands Commission;
 - b. Surrounding timber companies;
 - c. Surrounding landowners.
2. Prepare Land Report(s) to address:
 - a. Specific disposal methods and time frames (regarding management action No. 1 above).

MANAGEMENT AREA: BUTTE CREEK

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

III. MANAGEMENT ACTIONS (CONT.)

- b. Site-specific inventories/requirements:
 - i. Cultural resources;
 - ii. T&E species.
- 3. Sign entrance to public lands regarding ORV designations.

Rationale for the Proposed Action

The **ENHANCEMENT OF NATURAL VALUES ALTERNATIVE** is the **PROPOSED ACTION**.

This is the most significant area in numbers of spotted owls on public lands within the Arcata Resource Area and this area may be significant to the dispersal of spotted owls in Northern California. While it is also the Resource Area's most productive timberland, realistically spotted owls and timber management cannot be expected to coexist indefinitely on the same small block of land.

Specific considerations:

- Bureau Manual 6840 states, in part, "The fundamental objective is to maintain or increase current population levels of sensitive animals."
- The Bureau's policy for sensitive species management has a goal of "preventing deterioration of sensitive species habitat thereby precluding the need for listing those species," and that to do this we should "promote the enhancement of sensitive species habitat."
- Area contains four breeding pair of spotted owls.
- Inadequate information exists for spotted owls generally, within their range, on juvenile survival, first reproductive age and rate, and dispersal of birds (Audubon 1986). Until there is better information available we should be cautious in making resource decisions that may upset the current balance.
- The Butte Creek area is about 10 miles from Forest Service Spotted Owl Management Areas (SOMAs) and from State Parks having old-growth forests. The Butte Creek management area may provide an island or stepping stone to aid owls in dispersal.
- Area has excellent old-growth characteristics with a large owl population, and is an outstanding candidate for RNA/ACEC status.

MANAGEMENT AREA: KING RANGE VICINITY

There are no identified critical resource issues for this management area. The King Range National Conservation Area and this RMP proposes consistency with the King Range Management Program for land juxtaposed to the National Conservation Area. The issue of land tenure and adjustment is relevant to this management area; because of the significant BLM management presence in the area this is a logical area within which to consolidate land and resources for management efficiency. Two alternatives are offered with only minor differences.

1. Enhancement of Natural Values. Emphasizes enhancement of coastal watersheds and visual resources, ensures consistency with the King Range Management Program, and provides a logical geographic focus for long-term BLM management.
2. No Action. Recognizes the same basic resource values as the option above; proposes disposal of scattered, disjunct tracts between the King Range National Conservation Area and the Mattole River. The historic use of these tracts has been for consolidation within the King Range.

MANAGEMENT AREA: KING RANGE VICINITY

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

RETAIN: 3,780 acres surface
3,200 acres subsurface

ACQUIRE: 2,200 acres

DISPOSE: 120 acres

I. RESOURCE CONDITION OBJECTIVES

1. Enhance the watershed condition and visual quality of coastal streams.
2. Improve cost effectiveness of public land management by consolidation of ownership.
3. Ensure consistency with the existing King Range Management Plan. Lands contiguous to the National Conservation Area will be managed consistent with the "Zone" prescriptions which they abut. This involves Zones 2, 6 and 7.

II. LAND USE ALLOCATIONS (See Map 2-8)

1. Retain all public land between the King Range National Conservation Area and the Mattole River, except 120 acres of public land within the boundary of the Sinkyone Wilderness State Park which will be available for acquisition by the California Department of Parks and Recreation to enhance management of the State Park.
2. Retain 40 acres at the confluence of Eubanks Creek and the Mattole River for its fisheries and riparian values.
3. Actively pursue acquisition of 1,200 acres of land along Four Mile Creek and Cooskie Creek to enhance the riparian values and visual resources.
4. Actively pursue any opportunity to acquire lands in the Mattole River estuary and adjacent corridor of the Mattole River.
5. Remove 900 acres of suitable commercial forest land west of Cooskie Ridge from the timber production base. Include all other suitable commercial forest land in the management area, except for streamside buffers, in the timber production base. No annual allowable cut is planned for the next 100 years.
6. Actively pursue acquisition of 1,000 acres of high site, well-stocked commercial forest land adjacent to Zone 6 in the King Range National Conservation Area (Jewett Ridge and Bear Creek) for timber management.
7. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands west of Cooskie Ridge within the management area are designated CLOSED.

Lands east of Cooskie Ridge: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

MANAGEMENT AREA: KING RANGE VICINITY

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

II. LAND USE ALLOCATIONS (CONT.)

8. No Special Designations.
9. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations.
2. Sign entrance to public lands regarding ORV designations.
3. Post boundaries.

MANAGEMENT AREA: KING RANGE VICINITY

ALTERNATIVE: NO ACTION (Continuation of Present Management)

RETAIN: 2,800 acres surface **ACQUIRE:** 1,200 acres **DISPOSE:** 1,100 acres
3,200 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance the watershed condition and visual quality of coastal streams.
2. Ensure consistency with the existing King Range Management Plan. Lands contiguous to the National Conservation Area will be managed according to the "Zone" prescriptions which they abut. This involves Zones 2, 6 and 7 (see King Range National Conservation Area Management Program).
3. Provide an exchange base for acquisition of land within the King Range National Conservation Area.

II. LAND USE ALLOCATIONS

1. Retain public land contiguous to the King Range National Conservation Area. Scattered tracts between the King Range and the Mattole River are available for disposal. Public lands within the boundary of the Sinkyone Wilderness State Park are available for acquisition by the California Department of Parks and Recreation to enhance management of the State Park.
2. Actively pursue any opportunity to acquire lands in the Mattole River estuary and adjacent corridor of the Mattole River.
3. Actively pursue acquisition of 1,200 acres of land along Four Mile Creek and Cooskie Creek to enhance the riparian values and visual resources.
4. Remove 900 acres of suitable commercial forest land west of Cooskie Ridge from the timber production base. The remaining 1,660 acres of suitable commercial forest land in the management area, except for streamside buffers, is included in the timber production base. No annual allowable cut is planned for the next 100 years.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest.

5. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands west of Cooskie Ridge within the management area are designated CLOSED.

Lands east of Cooskie Ridge: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

MANAGEMENT AREA: KING RANGE VICINITY

ALTERNATIVE: NO ACTION (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

6. No Special Designations.
7. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations.
2. Sign entrance to public lands regarding ORV designations.
3. Post boundaries.
4. Contact California Department of Parks and Recreation about acquisition.
5. Contact landowners about land use Allocation No. 2.

Rationale for the Proposed Action

The **ENHANCEMENT OF NATURAL VALUES ALTERNATIVE** is the **PROPOSED ACTION**.

The King Range Vicinity is a logical geographic area to improve management efficiencies through consolidation of Federal ownership. The proposed action also provides for management of land which is compatible with the major themes within the King Range National Conservation Area.

MANAGEMENT AREA: RED MOUNTAIN

Three alternatives were generated for this management area. Because of existing designations and land use allocations covering large acreages (RNA/ACECs, National Wild and Scenic River Systems) many potential resource conflicts have been resolved and are not reanalyzed in this plan.

1. Enhancement of Natural Values. Emphasizes protection of old-growth characteristics, unique botanical values, and peregrine falcon habitat. A high level of timber production can also be achieved under this alternative (thus negating the necessity of a separate Timber Production alternative). Proposes acquisition for timber, peregrine falcon habitat, and other natural values. This alternative retains the 300 acres mitigation for pairs of spotted owls as specified in SYU 13 and recognizes the significance of existing old-growth reserves in the area. This is the proposed action.
2. No Action. Emphasizes protection of old-growth characteristics, unique botanical values, and peregrine falcon habitat. A high level of timber production can also be achieved under this alternative. The alternative also proposes land acquisitions for timber, peregrine falcon habitat, and other natural values.
3. Administrative Adjustments. This alternative acknowledges the interest by the California State Lands Commission to acquire large tracts in the management area. It assumes that excellence in protection and enhancement of certain resources can be achieved through disposal to selected entities. It also recognizes significant Federal interests and prohibits disposal of RNA/ACEC, Wild and Scenic River tracts, and critical peregrine falcon habitat.

Due to a typographical error in the DEIS the Administrative Adjustments Alternative has been changed from 12,700 acres of retention to 12,200 acres.

As pointed out in the Draft EIS, and on p. 3-15, of this document, approximately 14 miles of the South Fork of the Eel River, within the management area, have been designated as part of the National Wild and Scenic Rivers System. A river management plan is currently being prepared for that portion of the river between Horseshoe Bend and Highway 101 (approximately 7 miles). Management plans for the remaining portions of designated rivers will be developed in the future utilizing an interagency cooperative planning approach.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

RETAIN: 31,300 acres surface **ACQUIRE:** 7,000 acres **DISPOSE:** 3,000 acres
14,000 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance old-growth forest characteristics and related wildlife species. Provide islands of old-growth mixed-evergreen forest.
2. Enhance and facilitate protection of unique botanical values--particularly *Arabis mcdonaldiana*.
3. Protect nests and foraging habitat of peregrine falcons.
4. Enhance riparian habitat and anadromous fish streams.
5. Facilitate and encourage scientific research of the unique soils on Red Mountain.
6. Enhance the natural values within the Northern California Coast Range Preserve.
7. Protect and enhance natural and recreational values along the federally designated portions of the South Fork Eel River wild and scenic river corridor.
8. Provide forest products from forest land which does not interfere with identified natural values.
9. Improve cost effectiveness of public land management by consolidation of ownership.
10. Use public lands to help satisfy the State of California in-lieu entitlements.

II. LAND USE ALLOCATIONS (See Map 2-9)

1. Retain 31,300 acres of public lands within the management area. The following 3,000 acres will be assessed for disposal on a case-by-case basis:
 - T. 4 S., R. 5 E., HM, Sections 14, 15, 22, 27, 33, 34.
 - T. 5 S., R. 5 E., HM, Sections 2-4, 8, 14-15, 17-19, 20, 22, and 23.
 - T. 5 S., R. 4 E., HM, Sections 25, 26, 27, 32 and 33.
 - T. 24 N., R. 15 W., MDM, Sections 11 and 12.
 - T. 23 N., R. 15 W., MDM, Sections 17, 18, 20.
2. Actively pursue acquisition of:
 - a. Approximately 3,500 acres of high site, well-stocked commercial forest land within the management areas for timber production;

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

II. LAND USE ALLOCATIONS (CONT.)

- b. Up to 2,600 acres of land in the Charlton Creek and Bell Springs Creek watersheds to protect peregrine falcon nesting sites and foraging areas;
 - c. 900 acres of land along the South Fork Eel River between Elkhorn Ridge and Brushy Mountain to protect riparian values.
3. Remove suitable commercial forest land in the following areas from the timber production base:
 - a. Northern California Coast Range Preserve;
 - b. Cedar Creek portion of the Red Mountain ACEC:
T. 23 N., R. 17 W., MDM, Section 1.
 - c. Wild and Scenic River corridor (quarter mile on each side of the river);
 - d. Stream buffers as specified in SYU 13 environmental impact statement.
4. Harvest an average of 1.5 MMBF per year from the remaining timber production base of about 16,000 acres.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest.

5. Sensitive species will be considered and protected according to the BLM California Sensitive Species Policies (Appendixes 2-3 and 2-4). Spotted owls will be protected according to the SYU parameters and mitigations (Appendix 2-1).
6. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the Wild and Scenic River corridor and the NCCRP and Red Mountain ACECs are designated CLOSED.

All other public land: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

II. LAND USE ALLOCATIONS (CONT.)

7. Add about 80 acres in Stoten Opening to the Northern California Coast Range Preserve ACEC:

T. 21 N., R. 15 W., MDM, Section 6, that portion in the Elder Creek watershed.
8. Manage the South Fork of the Eel River Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of the Interior's Wild and Scenic River Guidelines, Appendix 2-5 (Federal Register, Volume 47, No. 173, pg. 39454, Section III) until a management plan is completed in FY 1990.
9. Public lands are available for dispersed recreation. (There are some restrictions on recreational uses within the NCCRP which still apply--no shooting, hunting or fishing, camping, equestrian use.)
10. The Red Mountain RNA/ACEC is not available for mineral material sales. The NCCRP is to be withdrawn from entry under the 1872 Mining Law and is not available for mineral leasing, or material sales.
11. The RNA/ACECs are not available for livestock grazing.

III. MANAGEMENT ACTIONS

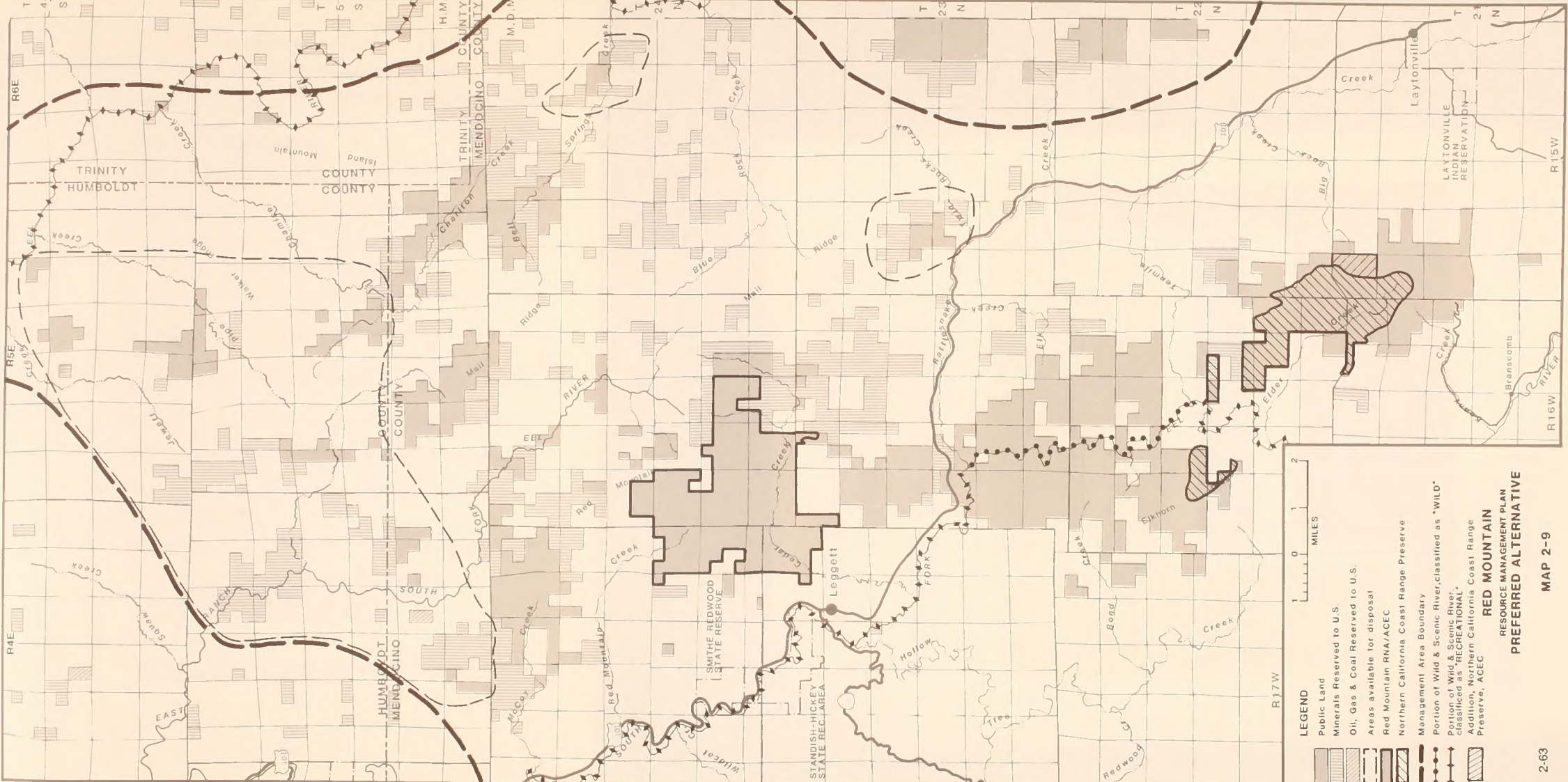
1. Implement Arabis Recovery Plan.
2. Fully implement ACEC Plans for Red Mountain and the Northern California Coast Range Preserve.
3. Prepare a wild and scenic river management plan for the portion of South Fork of the Eel River administered by BLM, in FY 1990. Complete remaining management plans on the Eel River, utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.
4. Federal Register notices:
 - a. ORV designations;
 - b. ACEC designation (regarding Land Use Allocation No. 7).
5. Sign entrance to public lands regarding ORV designations.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES/PROPOSED (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

III. MANAGEMENT ACTIONS (CONT.)

6. Acquire easements to public lands without adequate access.
7. Contact universities and other research institutions for expressions of interest in conducting research.
8. Contact surrounding landowners about acquisitions (see Land Use Allocation No. 2).
9. Prepare Land Report(s) to address:
 - a. Site-specific problems;
 - b. Specific acquisition methods (regarding management action No. 7 above).
10. Monitor peregrine falcons, spotted owls and other unique resources.
11.
 - a. Submit "Withdrawal Petition" to the Director, BLM, for transmittal to the Secretary of the Interior for approval regarding Land Use Allocation No. 9.
 - b. Upon approval of 10a, publish Federal Register notice stating a withdrawal proposal has been made.
12. Post boundaries.



LEGEND

- Public Land
- Minerals Reserved to U.S.
- Oil, Gas & Coal Reserved to U.S.
- Areas available for disposal
- Red Mountain RNA/ACEC
- Northern California Coast Range Preserve
- Management Area Boundary
- Portion of Wild & Scenic River classified as "WILD"
- Portion of Wild & Scenic River classified as "RECREATIONAL"
- Addition, Northern California Coast Range Preserve, ACEC

**RED MOUNTAIN
RESOURCE MANAGEMENT PLAN
PREFERRED ALTERNATIVE**

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: NO ACTION (Continuation of Present Management)

RETAIN: 32,300 acres surface **ACQUIRE:** 7,000 acres **DISPOSE:** 2,000 acres
14,000 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance old-growth forest characteristics and related wildlife species. Provide islands of old-growth mixed-evergreen forest.
2. Enhance and facilitate protection of unique botanical values--particularly *Arabis mcdonaldiana*.
3. Protect nests and foraging habitat of peregrine falcons.
4. Enhance riparian habitat and anadromous fish streams.
5. Facilitate and encourage scientific research of the unique soils on Red Mountain.
6. Enhance the suite of natural values within the Northern California Coast Range Preserve.
7. Protect and enhance natural and recreational values along the federally designated portions of the South Fork Eel River wild and scenic river corridor.
8. Provide forest products from forest land which does not interfere with identified natural values.
9. Improve cost effectiveness of public land management by consolidation of ownership.
10. Use public lands to help satisfy the State of California in-lieu entitlements.

II. LAND USE ALLOCATIONS

1. Retain 32,300 acres of public lands. Dispose of the following 2,000 acres of public land on a case-by-case basis:
 - T. 5 S., R. 5 E., HM, Sections 8, 14-15, 17-19, 20, 22-23.
 - T. 5 S., R. 4 E., HM, Sections 25, 26, 27, 32 and 33.
 - T. 24 N., R. 15 W., MDM, Sections 11 and 12.
 - T. 23 N., R. 15 W., MDM, Sections 17, 18, 20.
2. Actively pursue acquisition of:
 - a. 3,500 acres of high site, well-stocked commercial forest land within the management area for timber production;

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: NO ACTION (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

- b. 2,600 acres of land in the Charlton Creek and Bell Springs Creek watersheds to protect peregrine falcon nesting sites;
 - c. 900 acres of land along the South Fork Eel River between Elkhorn Ridge and Brushy Mountain to protect riparian values.
3. Remove suitable commercial forest land in the following areas from the timber production base:
 - a. Northern California Coast Range Preserve;
 - b. Cedar Creek portion of the Red Mountain ACEC:

T. 23 N., R. 17 W., MDM, Section 1.
 - c. Wild and Scenic River corridor (quarter mile on each side of the river);
 - d. Stream buffers as specified in the SYU 13 Environmental Impact Statement.
4. Harvest an average of 1.5 MMBF per year from the remaining available CFL base of about 16,000 acres.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.
5. Sensitive species will be considered and protected according to the BLM California Sensitive Species Policies (Appendixes 2-3 and 2-4).
6. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the Wild and Scenic River corridor and the NCCRP and Red Mountain ACECs are designated CLOSED.

All other public land: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

7. Add about 80 acres in Stoten Opening to the Northern California Coast Range Preserve ACEC:

T. 21 N., R. 15 W., MDM, Section 6, that portion in the Elder Creek watershed.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: NO ACTION (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

8. Manage the South Fork of the Eel River Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of the Interior's Wild and Scenic River Guidelines, Appendix 2-5 (Federal Register, Volume 47, No. 173, pg. 39454, Section III) until a management plan is completed in FY 1990.
9. Public lands are available for dispersed, unstructured recreation. (There are some restrictions on recreational uses within the NCCRP which still apply--no shooting, hunting or fishing, camping, equestrian use).
10. The Red Mountain RNA/ACEC is not available for mineral material sales. The NCCRP is to be withdrawn from entry under the 1872 Mining Law and is not available for mineral leasing, or material sales.
11. The RNA/ACECs are not available for livestock grazing.

III. MANAGEMENT ACTIONS

1. Implement Arabis Recovery Plan.
2. Fully implement ACEC Plans for Red Mountain and the Northern California Coast Range Preserve.
3. Prepare a wild and scenic river management plan for the portion of South Fork of the Eel River administered by BLM, in FY 1990. Complete remaining management plans on the Eel River, utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.
4. Federal Register notices:
 - a. ORV designations;
 - b. ACEC designation (regarding Land Use Allocation No. 7).
5. Sign entrance to public lands regarding ORV designations.
6. Acquire easements to public lands without adequate access.
7. Contact universities and other research institutions for expressions of interest in conducting research.
8. Contact surrounding landowners about acquisitions (see Land Use Allocation No. 2).

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: NO ACTION (Continuation of Present Management)

III. MANAGEMENT ACTIONS (CONT.)

9. Prepare Land Report(s) to address:
 - a. Site-specific problems;
 - b. Specific acquisition methods (regarding No. 7 above).
10. Monitor peregrine falcons, spotted owls, and other unique resources.
11. a. Submit "Withdrawal Petition" to the Director, BLM, for transmittal to the Secretary of the Interior for approval regarding Land Use Allocation No. 9.
 - b. Upon approval of management action 10a, publish Federal Register notice stating a withdrawal proposal has been made.
12. Post boundaries.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 12,200 acres **ACQUIRE:** 0 acres **DISPOSE:** 22,100 acres surface
14,000 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of Federal interests in areas of high visibility and significant Federal ownership.
2. Protect and enhance natural and recreational values along the federally designated portions of the South Fork Eel River wild and scenic river corridor.
3. Provide a land base in Humboldt County to satisfy acquisitions within the King Range National Conservation Area.
4. Satisfy the State of California in-lieu entitlements.

II. LAND USE ALLOCATIONS

1. Dispose of all Federal interests including minerals, except 12,200 acres including:
 - a. ACECs (Red Mountain and NCCRP);
 - b. Wild and Scenic River corridors (one quarter mile on each side of the river);
 - c. Endangered species habitat in Charlton Creek and Bell Springs Creek watersheds:

T. 5 S., R. 6 E., HM, Section 31.

T. 24 N., R. 15 W., MDM, Sections 4 and 5.

2. The priority for disposal of all land within Humboldt County is for King Range acquisitions. There are no specific priorities for lands in Mendocino County.
3. Keep suitable commercial forest land on areas to be disposed in the timber production base pending disposal. Commercial forest land in the areas to be retained (1a, 1b, 1c) shall be removed from the timber production base.
4. Public lands are not available for new livestock grazing leases.
5. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the Wild and Scenic River corridor and NCCRP and Red Mountain ACECs of the management area are designated CLOSED.

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

II. LAND USE ALLOCATIONS (CONT.)

All other public lands: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

6. Manage the South Fork of the Eel River Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5 (Federal Register, Volume 47, No. 173, pg. 39454, Section III) until a management plan is completed in FY 1990.
7. No new Special Designations.
8. Area is available for dispersed recreation. (The existing ACEC plan for the NCCRP puts some restrictions on types of recreational pursuits--these still apply--no shooting, hunting or fishing, camping, equestrian use and ORVs.)
9. The Red Mountain RNA/ACEC is not available for mineral material sales; the NCCRP is to be withdrawn from entry under the Mining Law of 1872 and is not available for mineral leasing or mineral material sales.

III. MANAGEMENT ACTIONS

1. Prepare a wild and scenic river management plan for the portion of South Fork of the Eel River administered by BLM, in FY 1990. Complete remaining management plans on the Eel River, utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.
2. Contact potential selectors for disposal of public lands and resources (not exclusively):
 - a. State Lands Commission;
 - b. Surrounding landowners;
 - c. Landowners within KRNCA;
 - d. Others.
3. Prepare Land Report(s) to address:
 - a. Specific disposal methods and time frames (regarding No. 1 above);
 - b. Site-specific inventories and requirements:

MANAGEMENT AREA: RED MOUNTAIN

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

III. MANAGEMENT ACTIONS (CONT'D)

- i. Cultural resources;
 - ii. Mineral reports;
 - iii. T&E species.
- 4. Federal Register notices:
 - a. ORV designations.
- 5. a. Submit "Withdrawal Petition" to the Director, BLM, for transmittal to the Secretary of the Interior for approval regarding Land Use Allocation No. 9.
- b. Upon approval of 4a, publish Federal Register notice stating a withdrawal proposal has been made.

Rationale for the Proposed Action

The ENHANCEMENT OF NATURAL VALUES is the PROPOSED ACTION.

This alternative protects wildlife (owls and fisheries), endangered animal species (peregrine falcons), and allows good timber management practices.

Much of the area in which timber management would conflict with other significant resources have been removed from the timber production base (Wild and Scenic Rivers corridors, Northern California Coast Range Preserve, Cedar Creek ACEC, and streamside buffers).

Benefits resulting from this alternative include:

- providing large, consolidated areas of old-growth mixed evergreen forest (Northern California Coast Range Preserve and Cedar Creek);
- providing 91 MMBF of commercial timber with a yield of 1.5 MMBF per year;
- protecting unique botanical values (*Arabis mcdonaldiana*);
- protecting peregrine falcon habitat;
- enhancing riparian and anadromous fisheries habitat (Eel River and Cedar Creek);
- encouraging the study of unique red soils in the Red Mountain ACEC; and
- making scattered parcels of land available for exchange and State indemnity selection.

MANAGEMENT AREA: COVELO VICINITY

Two alternatives were generated for this management area. They provide decisionmakers with a realistic and distinct range of options considering the issues of timber management, old-growth habitat, and State in-lieu selections.

1. Administrative Adjustments. Recognizes prior State in-lieu selections in this management area; assumes that resource protection and enhancement can be achieved through disposal to non-Federal entities. Recognizes that large tracts of public land (BLM-administered) are contiguous to the Mendocino and Six Rivers National Forests and that this area is within an administrative sphere of influence of the U.S. Forest Service. This is the proposed action.
2. No Action. Assumes the BLM will continue to manage remaining resources, with emphasis on the natural values of Eden Creek, and the Eel River corridor.

An alternative with emphasis on timber management was considered. Because the best timber lands within this area have recently been selected by the State Lands Commission and the significant natural values are not affected by remaining timber production, this alternative is not distinct from Alternative 2 above and is no longer considered as a separate option.

As pointed out in the Draft EIS and page 3-17 of this document, approximately 3 miles of the main stem, 3 miles of the North Fork, and 5 miles of the Middle Fork of the Eel River pass through BLM lands within the management area and have been designated as part of the National Wild and Scenic Rivers System. Management plans for these portions of the river will be developed in the future utilizing an interagency cooperative planning approach. Until these plans are completed, these river corridors will be managed in accordance with the Department's Wild and Scenic River Guidelines, Appendix 2-5.

MANAGEMENT AREA: COVELO VICINITY

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS/PROPOSED

RETAIN: 0 acres **ACQUIRE:** 0 acres **DISPOSE:** 66,500 acres surface
30,000 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of Federal interests in areas of high visibility with significant Federal ownership.
2. Protect and enhance natural and recreational values along the federally designated portions of the main stem and North and Middle Forks of the South Fork Eel River wild and scenic river corridor.
3. Help meet the State of California's in-lieu entitlements.

II. LAND USE ALLOCATIONS (See Map 2-10, Map Pocket)

1. All interests administered by the Bureau, including minerals, are to be disposed.
2. Manage the main stem and North and Middle Forks of the Eel River Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5 (Federal Register, Volume 47, No. 173, pg. 39454, Section III).
3. Suitable commercial forest land will be kept in the timber production base pending disposal, unless it is determined not to be economical to remove the timber. About 1.1 MMBF can be economically removed annually.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

4. Public lands are not available for new livestock grazing leases.
5. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

6. Public lands are available for dispersed recreation.

MANAGEMENT AREA: COVELO VICINITY

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS/PROPOSED

III. MANAGEMENT ACTIONS

1. Contact potential selectors for disposal of public lands and resources (not exclusively):
 - a. U.S. Forest Service;
 - b. State Lands Commission;
 - c. Surrounding landowners;
 - d. Timber industries and others.
2. Complete management plans for the main stem and North and Middle Forks of the Eel River utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.
3. Pursue legislation modifying boundaries of Mendocino National Forest and Six Rivers National Forest. Manage contiguous lands under cooperative agreements until legislation is consummated.
4. Prepare Land Report(s) to address:
 - a. Specific disposal methods and time frames (regarding management action No. 1 above);
 - b. Site-specific inventories and requirements:
 - i. Cultural resources;
 - ii. Mineral reports;
 - iii. T&E species.
5. Federal Register notices:
 - a. ORV designations.
6. Prepare a computer run to refine the annual allowable cut.

MANAGEMENT AREA: COVELO VICINITY

ALTERNATIVE: NO ACTION (Continuation of Present Management)

RETAIN: 66,500 acres surface
30,000 acres subsurface

ACQUIRE: 640 acres

DISPOSE: 0 acres

I. RESOURCE CONDITION OBJECTIVES

1. Enhance and facilitate protection of unique botanical values.
2. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of ownership.
3. Encourage and facilitate the use of Little Darby as an environmental education area.
4. Protect and enhance natural and recreational values along the federally designated portions of the main stem and North and Middle Forks of the South Fork Eel River wild and scenic river corridor.
5. Provide forest products from forest land which does not interfere with identified natural values.

II. LAND USE ALLOCATIONS (See Map 2-11, Map Pocket)

1. Public lands are not available for disposal.
2. Actively pursue acquisition of 640 acres of private inholdings within the boundaries of the Eden Creek RNA/ACEC to enhance manageability.
3. Manage for various forest products. Harvest an average of about 1.1 MMBF per year from the available commercial forest land base of 8,500 acres after streamside buffers, Little Darby, Willis Ridge, and RNA/ACECs are removed.

Tree planting, brush and hardwood release, and precommercial thinning will be done as part of the forest improvement program associated with this timber harvest as outlined in SYU 13.

4. Sensitive plant and animal species will be considered and protected according to the BLM California Sensitive Species Policies (Appendices 2-3 and 2-4).
5. Off-Road Vehicle Designations:

Public lands within the Eden Creek RNA/ACEC, Wild and Scenic River corridors, and Little Darby portion of the management area are designated CLOSED.

Remaining areas: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

MANAGEMENT AREA: COVELO VICINITY

ALTERNATIVE: NO ACTION (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

6. Designate Eden Creek (4,700 acres) as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of unique botanical values.

T. 21 N., R. 12 W., MDM, Sections 13-15, 22-27, 34-35.

T. 21 N., R. 11 W., MDM, Section 19.

7. Manage the main stem and North and Middle Forks of the Eel River Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5 (Federal Register, Volume 47, No. 173, pg. 39454, Section III).
8. Public lands are available for dispersed recreation.
9. The Eden Valley RNA/ACEC is not available for mineral material sales.
10. The Eden Creek RNA/ACEC is not available for livestock grazing.
11. Eden Creek RNA/ACEC is not open to sale of any forest products.

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
2. Sign entrance to blocks regarding ORV designations.
3. Contact universities and other research institutions for expressions of interest in conducting research.
4. Contact surrounding landowners about acquisitions.
5. Prepare Land Report(s) to address:
 - a. Specific acquisition methods.
6. Prepare an ACEC Activity Plan for Eden Creek.
7. Complete management plans for the main stem and North and Middle Forks of the Eel River utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors, until plans are completed.

MANAGEMENT AREA: COVELO VICINITY

ALTERNATIVE: NO ACTION (Continuation of Present Management)

III. MANAGEMENT ACTIONS (CONT.)

8. Prepare a new computer run for the annual allowable cut.
9. Pursue cooperative management agreement/interagency agreement with U.S. Forest Service for efficient management of this management area.
10. Post boundaries.

Rationale for the Proposed Action

The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE is the PROPOSED ACTION.

Lands in the Covelo Vicinity are distant from existing BLM offices. Some public lands are within an administrative sphere of influence of the Mendocino National Forest and there is a growing State Lands Commission presence within the area. Some of the BLM lands are administered by the Mendocino National Forest via Memorandum of Agreement. These lands can be best utilized by exchanging them for lands and resources which can be more easily and economically managed by the Bureau elsewhere (Lacks Creek, Red Mountain or adjacent to the King Range). Big Butte Wilderness is not available for exchange and can be best managed by the Forest Service (it is presently managed by the Covelo Ranger District through a cooperative management agreement). Therefore, the objective of this alternative is to use these lands to enhance the manageability of public lands and to improve cost effectiveness of resource management by consolidating the lands we manage in areas more easily accessible. With the exception of wilderness, Wilderness Study Areas, and federally designated portions of the National Wild and Scenic River System, we recognize that these lands could also be selected by the State to help satisfy their in-lieu entitlement.

This management unit contains some 66,500 acres of public land. Approximately 8,500 acres of this land is available for intensive forest management. Most of these CFLs have the necessary management infrastructure in place. If these lands are exchanged those improvements would be lost.

Little Darby is an area that is extensively used by local school groups for environmental education. This area should be more appropriately managed by one of the local governmental entities via disposal under the Recreation and Public Purposes Act.

Once the decision to retain or dispose of these lands was made a second decision was needed on whether the commercial forest land in this unit should be retained or removed from our allowable cut base. The decision was made to leave those lands requiring minimal investment in the timber production base. We have no way of knowing when or if these lands will be exchanged and we do not want productive lands to sit idle. Therefore, we plan to go ahead with sales identified in our 10-Year Forest Management Plan (Travis Ranch, Timbered Ridge, Mina, and Brush Mountain). We will also provide the minimal forest development work necessary for those areas if they are harvested. If the opportunity arises to exchange any of these sale areas we will stop all work on that sale.

There are several tracts in this unit that would require a significant investment to access or harvest the timber, e.g. Willis Ridge. Because the opportunity for a fair return on those investments is limited these areas will not be harvested and will be removed from the timber production base. We feel such changes are necessary if our allowable cut figures are to be realistic.

MANAGEMENT AREAS: SCATTERED TRACTS

Three alternatives were considered for this management area. They provide decisionmakers a range of realistic and distinct options vis-à-vis the significant issues: State of California indemnity selections, old-growth forest characteristics, and the viability of timber production.

1. No Action. The continuation of present management effects a level of both timber production and land disposals and protection of old-growth characteristics. This is the proposed action.
2. Administrative Adjustments. Recognizes opportunity for disposal and consolidation to improve Federal management efficiencies and to settle the State indemnity selections. This assumes these lands can be most effectively used as an exchange base to acquire lands which can be more effectively and efficiently managed.
3. Enhancement of Natural Values. Emphasizes enhancement of old-growth characteristics, peregrine falcon habitat, and other natural values. Assumes protection of these values is more critical than the production of timber within this management area.

An alternative with emphasis on enhancing timber management was considered. Because of the small, scattered nature of the timber stands, lack of legal and physical access, and difficulties dealing with the residential nature of private land surrounding many of these parcels, this alternative is considered economically indefensible and unreasonable from a manageability standpoint. Therefore, this alternative is dropped from further consideration.

Approximately 3,000 acres from the Clear Lake Resource Area scattered tracts were inadvertently omitted from the scattered tracts management area surface acres calculation. The addition of the omitted 3,000 acres and further refinements of acre calculations for the management area are reflected in the acreage totals to be retained, acquired and disposed in the FEIS. In addition, as a result of public input, the preferred alternative/proposed action was changed from the administrative adjustments in the DEIS to the no action in the FEIS to emphasize more old-growth protection and less land disposal. These changes have been incorporated into Chapters 2, 3, and 4 as necessary.

As pointed out in the Draft EIS and page 3-19 of this document, portion of the Eel and Van Duzien Rivers are designated as Wild and Scenic Rivers. Four small tracts of public land within the management area are located along these rivers and are managed by the Bureau. Management plans for these portion of the rivers will be developed in the future utilizing an interagency cooperative planning approach. Until these plans are completed, these river corridors will be managed in accordance with the Department's Wild and Scenic River Guidelines, Appendix 2-5.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: NO ACTION/PROPOSED (Continuation of Present Management)

**RETAIN: 8,600 acres ACQUIRE: 800 acres DISPOSE: 6,900 acres surface
82,800 acres subsurface**

I. RESOURCE CONDITION OBJECTIVES

1. Improve cost effectiveness of public land management by consolidation of Federal ownership.
2. Enhance natural values and provide opportunities for environmental education.
3. Protect and enhance natural and recreational values along the federally designated portions of the Eel and Van Duzien Rivers wild and scenic river corridor.

II. LAND USE ALLOCATIONS

1. Gilham Butte and Inagua Buttes in the Arcata Resource Area and Eagle Peak/Greenough Ridge and The Cedars in the Clear Lake Resource Area are to be retained; all other parcels are to be disposed.
2. Acquire about 800 acres around Gilham Butte for recreational uses.
3. Until such time as parcels are disposed, harvest an average of 0.3 MMBF per year from the timber production base of about 1,200 acres. Only streamside buffers and the RNA/ACECs are to be removed from the timber production base.
4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the management area's Wild and Scenic River corridors are designated CLOSED.

All other public lands: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. Designate Gilham Butte and Inagua Butte (about 3,600 acres) as Research Natural Areas (RNA)/Areas of Critical Environmental Concern (ACECs) for the preservation of old-growth values.

a. Gilham Buttes (2,550 acres):

T. 2 S., R. 2 E., HM, Portions of Sections 31 and 32.
T. 3 S., R. 1 E., HM, Sections 12, 13, and 24.
T. 3 S., R. 2 E., HM, Sections 5-9, 18-20, and 28.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: NO ACTION/PROPOSED (Continuation of Present Management)

II. LAND USE ALLOCATIONS (CONT.)

b. Iaqua Buttes (1,080 acres):

- T. 3 N., R. 2 E., HM, Sections 1 and 2.
- T. 3 N., R. 3 E., HM, Section 6.
- T. 4 N., R. 2 E., HM, Section 25.
- T. 4 N., R. 3 E., HM, Section 31.

The Gilham Butte and Iaqua Butte RNA/ACECs are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands and to protect the existing forest conditions.

6. Manage the Eel and Van Duzien Rivers Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5, (Federal Register, Volume 47, No. 173, pg. 39454, Section III).
7. Public lands are available for dispersed recreation. Acquire easements and construct a trail between Humboldt Redwoods State Park, Gilham Butte, and the King Range National Conservation Area.

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designations.
2. Contact potential selectors for disposal of public lands and resources.
3. Contact surrounding landowners for acquisition regarding Land Use Allocation No. 2.
4. Prepare Land Report(s) to address specific disposal acquisition methods (regarding Nos. 2 and 3 above).
5. Acquire public access into Gilham Butte, Pine Ridge, and Eagle Peak for recreational and educational uses.
6. Prepare ACEC Activity Plans to address site-specific needs, access, research proposals and priorities.
7. Complete management plans for the Eel and Van Duzien Rivers utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

RETAIN: 5,000 acres **ACQUIRE:** 0 acres **DISPOSE:** 10,500 acres surface
82,800 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance manageability of public lands and improve cost effectiveness of resource management by consolidation of Federal interests in areas of high visibility with significant Federal ownership.
2. Protect and enhance natural and recreational values along the federally designated portions of the Eel and Van Duzien Rivers wild and scenic river corridor.
3. Help satisfy the State of California's in-lieu entitlements.

II. LAND USE ALLOCATIONS (See Map 2-12, Map Pocket)

1. All Federal interests, including minerals, are to be disposed, except the Eagle Peak/Greenough Ridge areas, and The Cedars (pending completion of the *Streptanthus* study).
 - a. Eagle Peak/Greenough Ridge (2,000 acres) for peregrine falcon habitat:
 - T. 16 N., R. 13 W., MDM, Sections 5 and 6.
 - T. 16 N., R. 14 W., MDM, Sections 4, 9-11, 14, 15.
 - T. 17 N., R. 13 W., MDM, Sections 31 and 32.
 - T. 17 N., R. 14 W., MDM, Sections 14 and 23-24.
 - b. The Cedars (3,000 acres) for sensitive plant species:
 - T. 9 N., R. 11 W., MDM, Sections 7, 17-19 and 30.
 - T. 9 N., R. 12 W., MDM, Section 24.
2. Manage the Eel and Van Duzien Rivers Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5, (Federal Register, Volume 47, No. 173, pg. 39454, Section III).
3. Prevent discretionary encumbrances to disposal:
 - a. Remove suitable commercial forest land from the timber production base to make the land more attractive to potential selectors. Manage as an unregulated forest;
 - b. Public lands are not available for livestock grazing.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: ADMINISTRATIVE ADJUSTMENTS

II. LAND USE ALLOCATIONS (See Map 2-12, Map Pocket) (CONTD.)

4. Off-Road Vehicle Designations (pursuant to 43 CFR 8340):

Public lands within the management area's Wild and Scenic River corridors are designated CLOSED.

All other public lands: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. No Special Designations.

6. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Contact potential selectors for disposal of public lands and resources (not exclusively):

- a. State Lands Commission;
- b. Surrounding private landowners;
- c. Surrounding timber industry owners;
- d. Conservation Organizations.

2. Prepare Land Report(s) to address:

- a. Specific disposal methods and time frames (regarding management action No. 1 above);
- b. Site-specific inventories and requirements:
 - i. Cultural Resources;
 - ii. T&E Species.

3. Complete management plans for the Eel and Van Duzien Rivers utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.

4. Federal Register notices:

- a. ORV designations.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

RETAIN: 6,000 acres **ACQUIRE:** 1,000 acres **DISPOSE:** 9,500 acres surface
82,800 acres subsurface

I. RESOURCE CONDITION OBJECTIVES

1. Enhance and protect old-growth forest characteristics and related wildlife species. Provide old-growth islands of mixed-evergreen forest.
2. Protect the habitat of the peregrine falcon.
3. Ensure protection of the habitat of *Streptanthus* at The Cedars.
4. Protect and enhance natural and recreational values along the federally designated portions of the Eel and Van Duzien Rivers wild and scenic river corridor.

II. LAND USE ALLOCATIONS

1. Dispose of all Federal interests (including minerals) except:
 - a. Iaqua Buttes (1,080 acres) for old-growth forest characteristics.
T. 3 N., R. 2 E., HM, Sections 1 and 2.
T. 3 N., R. 3 E., HM, Section 6.
T. 4 N., R. 2 E., HM, Section 25.
T. 4 N., R. 3 E., HM, Section 31.
 - b. Eagle Peak/Greenough Ridge (2,000 acres) for peregrine falcon habitat:
T. 16 N., R. 13 W., MDM, Sections 5 and 6.
T. 16 N., R. 14 W., MDM, Sections 4, 9-11, 14, 15.
T. 17 N., R. 13 W., MDM, Sections 31 and 32.
T. 17 N., R. 14 W., MDM, Sections 14 and 23-24.
 - c. The Cedars (3,000 acres) for sensitive plant species:
T. 9 N., R. 11 W., MDM, Sections 7, 17-19 and 30.
T. 9 N., R. 12 W., MDM, Section 24.
2. Actively pursue acquisition of 1,000 acres of private land in the area with the legal description given for retention above in land use allocation No. 1.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

II. LAND USE ALLOCATIONS (CONT.)

3. To protect the RNA/ACECs and to prevent discretionary encumbrances to disposal:
 - a. All suitable commercial forest land is to be withdrawn from the timber production base;
 - b. Public lands are not available for livestock grazing.

4. Off-Road Vehicle Designations:

Public lands within the areas mentioned in Land Use Allocations No. 1 are designated CLOSED.

Remaining public lands: Vehicles are LIMITED to roads; roads are defined as transportation facilities designed for highway vehicles having four or more wheels.

5. Designate areas described in Land Use Allocations No. 1 above as Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC) for the preservation of old-growth values.

Forest stands in RNA/ACECs are available for nonconsumptive research and cone collecting. Fire, disease, and insects will be controlled to prevent spreading to other lands and to protect the existing forest condition.

6. Manage the Eel and Van Duzien Rivers Wild and Scenic River corridor (measured horizontally, 1/4 mile from normal high water line on either side of the river) in accordance with the Department of Interior's Wild and Scenic River Guidelines, Appendix 2-5, (Federal Register, Volume 47, No. 173, pg. 39454, Section III).

7. Public lands are available for dispersed recreation.

III. MANAGEMENT ACTIONS

1. Federal Register notices:
 - a. ORV designations;
 - b. RNA/ACEC designation.
2. Contact potential selectors regarding acquisitions and land disposal:
 - a. State Lands Commission;
 - b. Counties and other local entities;
 - c. Individuals/surrounding landowners.

MANAGEMENT AREA: SCATTERED TRACTS

ALTERNATIVE: ENHANCEMENT OF NATURAL VALUES (Emphasize Nonconsumptive Uses and Enhancement of the Environment)

III. MANAGEMENT ACTIONS (CONT.)

3. Prepare Land Report(s) to address:
 - a. Specific acquisition time frames and methods (regarding management action No. 2 above).
4. Sign entrance to public lands regarding ORV designations.
5. Contact universities and other research institutions for expressions of interest in conducting research.
6. Prepare ACEC Activity Plans to address site-specific needs, access, research proposals and priorities, etc.
7. Complete management plans for the Eel and Van Duzien Rivers utilizing an interagency cooperative management planning approach. Provide interim management protection to these river corridors until plans are completed.
8. Monitor cultural resources, peregrine falcons, and old-growth characteristics.

Rationale for the Proposed Action

The NO ACTION ALTERNATIVE is the PROPOSED ACTION.

The emphasis of this alternative is to carry on with the present management direction of preserving old-growth values in the Gilham Butte and Laqua Buttes areas and other unique values in the Clear Lake Resource Area (Eagle Peak/Greenough Roughs and The Cedars). Scattered, isolated parcels in Humboldt, Mendocino and Sonoma Counties will be exchanged to help consolidate Federal ownership within the Resource Area.

This alternative would enhance the manageability of public lands and improve the cost effectiveness of resource management by helping to consolidate Federal ownership and would also offer a significant contribution to the preservation of old-growth values in the Resource Area.

This recommendation would result in shifting resource use on 2,400 acres of available CFL from timber harvest to old-growth habitat preservation. Some level of timber management would be practiced on about 1,200 acres of available CFL containing 18 MMBF until these areas are disposed. This would equate to an allowable cut of .3 MMBF per year.

The remaining CFL in this management area, 2,450 acres, will be managed as unregulated volume because of its inaccessibility and small timber volume and used as exchange parcels.

TABLE 2-1

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE SAMOA PENINSULA MANAGEMENT AREA

ISSUE	NO ACTION (PROPOSED ACTION)	ENHANCEMENT OF NATURAL VALUES	ENHANCEMENT OF RECREATIONAL VALUES	ADMINISTRATIVE ADJUSTMENTS
Impacts on ORV Recreational Use Levels	ORV recreational use on the Samoa Dunes will increase from 8,000 visitor days per year to nearly 17,000 visitor days. ORV use on the Manila Dunes will diminish from 3,000 visitor days per year to nearly 1,500 visitor days.	Impacts on the Samoa Dunes would be the same as for the No Action (Proposed Action). Motorized recreation use of 3,000 visitor days on Manila Dunes would be foregone.	Impacts on Samoa Dunes would be the same as for the No Action (Proposed Action); however, vehicle use on the Manila Dunes would increase from 3,000 visitor days per year to nearly 5,000 visitor days.	Impacts would be the same as for the No Action (Proposed Action).
Impacts on Botanical Values and Passive Recreation	Botanical values within the Samoa Dunes will be protected and passive recreation will be enhanced. Botanical values and passive recreation on the Manila Dunes will moderately benefit as a result of restricting motorized use to 47 acres.	Impacts would be the same as for the No Action (Proposed Action).	Impacts on the Samoa Dunes would be the same as for the No Action (Proposed Action). There would be significant adverse impacts to botanical values on Manila Dunes. Opportunities for passive recreation would also be negatively impacted.	Impacts on the Samoa and Manila Dunes would be the same as for the No Action (Proposed Action).

TABLE 2-2
COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE LACKS CREEK MANAGEMENT AREA

ISSUE	TIMBER PRODUCTION (PROPOSED ACTION)	NO ACTION	ENHANCEMENT OF NATURAL VALUES	ADMINISTRATIVE ADJUSTMENTS
Impacts on the Availability of Timber to the Market	A long-term, positive impact on the area's timber resources. The potential commercial timber to market is also expected to increase--from 32 MMBF to 150 MMBF.	About 6 MMBF of standing volume would be removed temporarily from timber production but would be harvested once the 400 acs. on which they are located are disposed. The annual available cut would be reduced from .5 to .4 MMBF. 1,800 acres of high-site, well-stocked CFL would be acquired, timber stand improvements implemented, and access to isolated parcels acquired, off-setting these effects and increasing potential commercial timber to market from 26 to nearly 116 MMBF.	Loss of 32 MMBF of standing volume valued at \$3 million. While this will not significantly impact the local economy, it will have a moderate, long-term negative impact on the area's timber resources.	All suitable CFL will be kept in production, no timber land acquisitions nor stand improvements are proposed which would adversely affect the area's timber resources.
Impacts on Spotted Owls and Other Old-Growth Forest Values	Adversely impacts some old-growth forest values including one pair of spotted owls. The area's 800-acre old-growth reserve would protect old-growth values and a single male owl.	Adversely impacts some old-growth forest values including one pair of spotted owls. The area's 800-acre old-growth reserve would protect old-growth values and a single male owl.	Moderately benefits the old-growth values on 800 acres. Acquiring 1,800 acres in the Lacks Creek watershed would further benefit these values.	Adversely impacts 800 acres of the area's old-growth forest values including one pair of spotted owls and one male spotted owl.
Impacts on Land Tenure Adjustment	No impact on the State of California indemnity selection entitlements. Approximately 1,800 acres of high-site, well-stocked CFL will be acquired as will permanent access to timbered tracts, benefiting the manageability of the area.	No impact on the State's indemnity selection entitlements.	No impact on the State's indemnity selection entitlements.	All 4,500 acres of public land within the management area would be available for disposal, helping satisfy the State's indemnity selections. The land is appropriate for King Range acquisition in Humboldt County and could be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence.

TABLE 2-3

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE BUTTE CREEK MANAGEMENT AREA

ISSUES	ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION)	TIMBER PRODUCTION	NATURAL HISTORY	NO ACTION	ADMINISTRATIVE ADJUSTMENTS
Impact on the Availability of Timber to Market	The loss of 53 MMBF valued at \$5 million current stumpage value, from the market. While this will not significantly impact the local economy, it will have a long-term negative impact on the area's timber resources.	The potential for commercial timber to market is expected to increase from 53 MMBF to 125 MMBF.	Remove nearly 26 MMBF from the market. This loss would be offset with the acquisition of 900 acres of high-site, well-stocked CFL near Larabee Butte which would add 0.38 MMBF to the annual commercial timber availability and increase the potential commercial timber from 27 MMBF to 63 MMBF.	27 MMBF would be removed from the market and the annual available cut reduced from 0.85 MMBF to 0.40 MMBF. This loss will be offset with the acquisition of 900 acres of high-site well-stocked CFL which would add 0.38 MMBF to the annual commercial timber availability.	Although all suitable CFL will be kept in production, no timber land acquisition or stand improvements are proposed. As a result, the area's timber resources would be significantly impacted.
Impact on Spotted Owls and Other Old-Growth Forest Values	360 acres of old growth will be preserved and the habitat for the four existing pair of nesting spotted owls will be maintained. Acquisition of 900 acres for the expansion of old-growth dependent species and riparian values will also serve to benefit the owls and old-growth forest values. These values will be further enhanced by prohibiting livestock grazing, mineral material sales, and ORV use.	The dispersal of four pair of nesting spotted owls. In addition, 360 acres of old-growth forest values in the Butte Creek portion of the management area would be lost.	Dispersal of two pair of spotted owls. Roughly 1,235 acres of CFL in the Butte Creek block would be removed from the timber base, preserving habitat for the two remaining pair of owls. The acquisition of 900 acres in the Butte Creek watershed would allow expansion of old-growth dependent species and riparian values and would further preserve and expand the habitat of the owls.	Protecting the area's four breeding pair of spotted owls and existing old-growth values.	The entire management area would be disposed adversely impacting the area's old-growth forest values and displacing the four pair of nesting spotted owls found in the area.
Impact on Land Tenure Adjustment	No impact on the State of California's indemnity selection entitlements. Approximately 900 acres in the Butte Creek watershed will be acquired enhancing riparian values and the manageability of the area's wildlife resources.	No impact on the State's indemnity selection entitlements. Approximately 900 acres of high-site well-stocked CFL would be acquired enhancing the manageability of the area's timber resources.	No impact on the State's indemnity selection entitlements. Approximately 900 acres in Butte Creek watershed and 900 acres of high-site, well-stocked CFL would be acquired enhancing the manageability of the area's timber resources.	No impact on the State's indemnity selection entitlements. Approximately 900 acres of high-site well-stocked CFL would be acquired enhancing the manageability of the area's timber resources.	All 2,500 acres of public land within the management area would be available for disposal, thereby helping to satisfy the State's indemnity selection. The land is appropriate for King Range acquisition in Humboldt County and could also be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence.

TABLE 2-4

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE KING RANGE VICINITY MANAGEMENT AREA

ISSUES	ENHANCEMENT OF NATURAL VALUES	NO ACTION
Impact on Land Tenure Adjustment	No impact on the State of California's indemnity selection entitlements.	1,100 acres would enhance management of the Sinkyone Wilderness State Park.
	Approximately 2,300 acres will be acquired to enhance riparian values, visual resources and timber management and consolidate Federal ownership significantly benefiting administrative efficiencies.	Approximately 1,200 acres would be acquired to enhance riparian values and visual resources and consolidate Federal ownership, significantly benefiting administrative efficiencies.

TABLE 2-5

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE RED MOUNTAIN MANAGEMENT AREA

ISSUES	ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION)	NO ACTION	ADMINISTRATIVE ADJUSTMENTS
Impact on the Availability of Timber to the Market	Reduce the amount of timber available to the market from 105 MMBF to 91 MMBF. This loss will neither significantly impact the local economy nor have a negative impact on the area's timber resources. 3,500 acres of high-site, well-stocked CFL will be acquired. This, coupled with stand improvements and timber easement acquisitions, will increase the potential timber to market from 91 MMBF to 450 MMBF.	Impacts would be the same as the Enhancement of Natural Values (Proposed Action).	No impact on the availability of timber to the market.
Impact on Spotted Owls and Other Old-Growth Forest Values	Protecting 1,910 acres of old-growth reserve and habitat for three pair of spotted owls. About 3,500 acres of land will be acquired and motorized vehicles will be excluded from the more sensitive portions of the management area further benefiting these values. Timber production will be permitted on the remaining 22,100 acres (including the Jewett Rock Reserve) but will not significantly impact the area's three pair of spotted owls nor other significant old-growth forest values.	Impacts would essentially be the same as the Enhancement of Natural Values (Proposed Action). However, all 2,710 acres of old-growth candidate reserve (including Jewett Rock) would be preserved.	Considerable protection would be afforded 1,910 acres of old-growth reserve, the three pair of spotted owls and other old-growth forest values on the 12,700 acres slated for retention. No significant effect to the preservation of representative samples of the old-growth forest ecosystem or spotted owls.
Impact on Land Tenure Adjustment	3,000 acres of public land within the management area will be available for disposal, thereby helping to satisfy the State's indemnity selection. Protects peregrine falcon nesting sites; protects riparian values. Acquisitions will enhance the manageability of the area.	2,000 acres would be available for disposal and could be used to help satisfy the State's indemnity selection. Impacts to the area's manageability would be the same as the Enhancement of Natural Values (Preferred) Alternative.	22,100 acres of land encompassing 16,000 acres of CFL would be available for disposal, significantly helping to satisfy the State's indemnity selection. Lands could also be disposed for the proposed acquiring Federal lands and resources elsewhere. This land is appropriate for King Range acquisitions in Humboldt County and could also be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence.

TABLE 2-6

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE COVELO VICINITY MANAGEMENT AREA

ISSUES	ADMINISTRATIVE ADJUSTMENTS (PROPOSED ACTION)	NO ACTION
Impact on the Availability of Timber to the Market	Adversely impacts the area's timber resources. All 9,400 acres of available CFL, however, will be kept in timber production pending disposal, providing 1.3 MMBF to the market annually.	Reduces the amount of timber available to the market from 89 MMBF to 70 MMBF. 1.1 MMBF would be harvested annually from the remaining 8,500 acres of CFL. However, this reduction will be offset by tree plantings, brush and hardwood release, precommercial thinning and other forest improvements. As a result of these actions the potential commercial timber to market is expected to increase--from 70 MMBF to 220 MMBF.
Impact on Spotted Owls and Other Old-Growth Forest Values	The spotted owls and other old-growth forest values will continue to be protected and will be enhanced through consolidation. No significant old-growth forest values on these parcels, disposal will only minimally affect old-growth forest values.	Protects the spotted owls and old-growth forest values found on these lands. These areas would also be closed to motorized vehicle use further benefitting old-growth forest values.
Impact on Land Tenure Adjustment	Consolidates Federal land management and benefits the manageability of the Resource Area. The remaining 21,500 acres will be available for in-lieu selections and could help satisfy the State of California's indemnity selection entitlements.	No impact on the State's indemnity selection entitlements.

TABLE 2-7

COMPARISON OF ALTERNATIVES: SUMMARY OF ENVIRONMENTAL IMPACTS
FOR THE SCATTERED TRACTS MANAGEMENT AREA

ISSUES	ADMINISTRATIVE ADJUSTMENTS	ENHANCEMENT OF NATURAL VALUES	NO ACTION (PROPOSED ACTION)
Impact on the Availability of Timber to the Market	108 MMBF of timber made available to the market. While this will not significantly impact the local economy, it will have a minor, long-term negative effect on the area's timber resources.	14 MMBF valued at \$1 million would be lost to the market. The remaining 9,500 acres would be disposed but these lands would probably be acquired by surrounding landowners and 94 MMBF made available to the market. The economic impacts would be the same as the Administrative Adjustments Alternative.	90 MMBF valued at \$9 million would be lost to the market. Timber on the remaining 1,200 acres of the timber production base would be harvested providing 0.3 MMBF of timber per year to the market until these lands are disposed. While this will not significantly impact the local economy, it will have a significant, long-term negative effect on the Area's timber resources.
Impact on Spotted Owls and Other Old-Growth Forest Values	Some components of old-growth forests will be lost including existing old-growth reserve at Gilham Butte (1,320 acres), laqua Buttes (390 acres) and Big Bend (280 acres) and the breeding pair of spotted owls in laqua Buttes and the pair of owls in Gilham Butte. 5,000 acres within the Eagle Lake/Greenough Ridge area and The Cedars will be retained and closed to ORV use protecting the peregrine falcon habitat and sensitive plant species on these parcels.	Some components of old-growth forests will be lost including existing old-growth reserve at Gilham Butte (1,320 acres) and Big Bend (280 acres). 6,000 acres within the Eagle Peak/Greenough Ridge area, The Cedars, and laqua Buttes will be retained, designated RNAs/ACECs, and closed to ORV use protecting old-growth forest values within these areas, including the breeding pair of spotted owls in laqua Buttes.	Some components of old-growth forests will be lost including Big Bend (280 acres). 8,600 acres will be retained within the Eagle Peak/Greenough Ridge area, The Cedars, laqua Buttes and Gilham Butte. In addition, laqua Buttes and Gilham Butte would be designated RNAs/ACECs and closed to ORV use. As a result of these actions 1,710 acres of old-growth reserve and old-growth forest values within these areas would be protected including the pair of spotted owls in laqua Buttes.
Impact on Land Tenure Adjustment	No impact on the State's indemnity entitlements.	No impact on the State's indemnity entitlements. Approximately 1,000 acres of private land within the Eagle Peak/Greenough Ridge area, The Cedars, and laqua Buttes would be acquired to consolidate Federal ownership moderately benefiting the manageability of these areas.	The impacts would be the same as the Administrative Adjustments and Natural Values Alternatives. 800 acres of private land around Gilham Butte would be acquired and would minimally benefit the manageability of the area.

CHAPTER 3

AFFECTED ENVIRONMENT

CHAPTER 3

AFFECTED ENVIRONMENT

INTRODUCTION

Chapter 3 presents a description of the social, economic, and physical components of the environment which are found in the Arcata Resource Area.

The first three general discussions below are presented to better understand the operating environment, significance of the resources, the public concern about spotted owls and old-growth forests, and the background to the State Indemnity Selections. Following these discussions are descriptions of the resources found in each management area.

REGIONAL PERSPECTIVE

THE SPOTTED OWL

The northern spotted owl occurs in the forested areas of southwestern British Columbia, western Washington, western Oregon and northwestern California. Information from research, inventories, and monitoring programs indicates that the population may be declining in the region from one to four percent annually.

Spotted owls show a preference for old-growth and use mature forest types in their daily and yearlong activities. In Oregon, research indicates home ranges include an average of 2,200 acres of old-growth forest, and in Washington the average is nearly 5,000 acres. Research findings indicate that old-growth forests provide conditions for the optimum number of spotted owl prey species. In addition, they provide conditions that make prey available, cavities suitable for nesting, thermal cover, and protection from predators.

Loss of old-growth forest and forest fragmentation contribute to spotted owl population declines. Forest fragmentation results in larger home ranges, greater expenditure of energy for foraging, decreased probability that dispersing juvenile spotted owls will locate suitable habitat, and habitat loss and unsuitability at a greater rate than the actual reduction in old-growth/mature forest acreage.

Habitat managed by BLM, nearly all of which is historically fragmented, may play a crucial role in maintaining genetic links between spotted owl habitat areas and sustaining a proper distribution of owls throughout their historical range.

Although uncertainties exist throughout the information base on spotted owls, research continues to contribute to the growing literature base.

Over 20 study/research projects are currently underway on spotted owl biology and habitat requirements in the States of Oregon, Washington, and California. Findings from many of these research efforts should be available for reference in the next 5 years while others may not be available for 10 years or more. There is sufficient information now documenting that if planned timber harvest continues, further decline of the owl population on BLM lands will occur. Additional research is needed for making decisions on maintaining individual owl sites and population viability.

The key issue in the BLM decision to harvest or not to harvest the remaining old-growth/mature timber is the uncertainty of the effect of this decision on the overall viability of the owl population. While the significance of BLM lands in maintaining genetic links between other owl populations and population viability is not well known, research on other species and the principles of island biogeography suggest these lands may provide a link.

The U.S. Fish and Wildlife Service (FWS) announced in the Federal Register on 6/23/89 that the northern spotted owl is now being considered for inclusion on the Federal list of endangered and threatened species. Section 7(a) (4) of the Endangered Species Act, and Bureau implementing manual section, requires that Federal agencies confer with the U.S. Fish and Wildlife Service (FWS) on any action that may affect the continued existence of a proposed species or result in destruction or adverse modification of proposed critical habitat. This means that BLM must confer with FWA on all projects (e.g. timber sales) which may impact the northern spotted owl or affect its recovery. Projects will be reviewed to determine their impact on owls, habitat for dispersing owls, preventing further isolation of subpopulations and maintaining future management options for northern spotted owls. The FWS is presently developing a definition of suitable spotted owl habitat.

In California the northern spotted owl is classified as a species of special concern by the California Department of Fish and Game, and although this carries no legal status it is intended to draw attention to its declining populations.

Spotted owl habitat occurs in the old-growth forests of Northern California particularly in the region comprised of Mendocino, Humboldt and Del Norte counties. Approximately 560,000 acres of old-growth Douglas-fir habitat have been identified on Federal, state and private lands in this region.

Accurate inventories of the total spotted owl population in this tri-county region have not been made; BLM wildlife specialist estimate that eight pairs and three individual owls can be found on the BLM lands in the Arcata Resource Area. The Six Rivers and Mendocino National Forests have confirmed inventories of approximately 200 pairs of spotted owls and plan to manage for 100 pairs of owls, based on Draft Forest Plans submitted in 1987. These managed pairs will be distributed throughout each forest as part of a network of spotted owl habitat areas, of 2,000+ acres.

In addition, an undetermined number of spotted owls exist in Redwood National Park and state parks in this region. It is also assumed that spotted owls exist on private forest lands, although figure are not available and remaining habitat is being lost as a result of logging operations.

The Ukiah District made an effort in the Timber Management Environmental Impact Statement for Sustained Yield Unit 13 (1981) to address the spotted owl/old-growth issue. The District developed guidelines (Appendix 2-2) to mitigate loss of habitat. In early 1986, the Bureau assigned a team to review the status of the northern spotted owl on BLM lands in western Oregon, Washington, and northern California. The team was to identify key questions of concern to Bureau managers, review the existing scientific information about the owl, and identify gaps in that information and where uncertainty exists.

On August 12, 1988, the Bureau became a co-signer to an Interagency Agreement with the Fish and Wildlife Service to cooperate and share information toward the goal of ensuring the population viability of the spotted owl. Under the Agreement, the Bureau agreed to manage habitats to provide for a number and distribution of spotted owls that ensures continued existence of a well distributed population on those lands so they may interact with spotted owls throughout its range.

In addition, the Bureau will set standards and guidelines, as part of its land management planning process, for the condition and management of habitats designed to contribute to spotted owl occupancy and reproduction. Habitat and population inventories will be accomplished and monitoring will be continued so that long-term trends may be indicated. The Bureau will join with others carrying out research useful in making management decisions and will be a participant in preparing an annual report on condition and trend in population and habitat.

SIGNIFICANCE OF OLD-GROWTH

The Draft Environmental Impact Statement for Sustained Yield Unit 13 (SYU 13) presents a detailed analysis of the significance of old-growth forests and the public concern which exists in northern California. A summary and update of these discussions is given below (see SYU 13 DEIS, pp. 3-21 - 3-26 and 3-32 - 3-35 for more details).

Because of the long-term stability of old-growth stands, certain wildlife and plant species have evolved in harmony with this stable condition and little need has arisen for these species to be highly adaptable to rapid changes in their habitat (Wight, 1974). Intensive timber management practices severely alter forest habitat. Old-growth is the most difficult stage of forest succession to provide under present concepts of silviculture and is the stage that is most rapidly being lost (Miller, 1978).

Throughout SYU 13 (for all practical purposes the RMP study area) forest habitat on BLM public lands occurs on small scattered blocks. The highest quality wildlife habitat within these blocks occurs near perennial streams. The BLM controls many widely scattered stands of old-growth mixed evergreen with rhododendron forest (using the Kuchler vegetation classification in Barbour and Major, 1977), in northwestern California. Extensive logging on intervening areas of private land, and to a lesser degree on BLM land, has resulted in the insularization of the forest habitat. As these habitat islands become smaller they lose their ability to provide suitable habitat, particularly for species that need large areas to fulfill their lifecycle requirements. Some of the remaining BLM managed islands may represent important reservoirs for old-growth and mature forest species; they have the potential to provide long-term unique and diverse habitats.

Natural areas include natural features such as biological, geological, paleontological, or other landscape elements that warrant preservation for scientific or educational purposes because of their uniqueness, scarcity, or representativeness. One of the primary goals of any natural area program is the preservation of representative samples of all ecosystems. The Bureau subscribes to the natural area concept and strives to identify those areas on public lands which warrant such identification. The major ecosystem for consideration here is low elevation mixed evergreen forest which is becoming increasingly rare due to logging in the outer Coast Range.

TABLE 3-1

OLD-GROWTH OF 300 ACRES OR MORE
IN THE ARCATA RESOURCE AREA

	Lacks Creek	Iaqua Butte	Big Bend	Butte Creek	Gilham Butte	King Range	Jewett Rock	Charlton White Slide	Cedar Creek	NCCRP/ Elder Creek	Big Butte Wilderness	Hulls Creek	Tom Long	TOTAL
Area Size	4,500	1,080	280	2,500	2,550	60,000	800	1,100	6,900	7,400	9,000	330	400	96,840
Old-Growth Habitat Acres Recom- mended for O-G Study in 1982	800	390	280	360	1,320	-----	800	1,100	810	-----	-----	330	-----	6,190
Inventoried Acres of Old-Growth Timber	190	186	113	360	390	5,000	0	600	180	2,800	2,800	300	167	13,086
Stand Age (Years)	150 - 200	150 - 200	200	150 - 250	200 - 300	170 - 300	-----	150 - 200	300	170 - 250	300 +	200 +	150 - 250	
Acres Proposed for Old-Growth RNA/ ACEC/Acres of Old-Growth Habitat	800 / 800	1,080 / 390	-----	2,500 / 360	2,550 / 1,320	-----	-----	-----	NA/ 810	80/ NA	-----	-----	-----	7,122 / 3,680
Acres of Old-Growth Protected But Not as Old-Growth RNA/ACEC	-----	-----	-----	-----	-----	NA/ 5,000	-----	-----	-----	7,400 / 2,800	2,800	-----	-----	10,600
Proximity to USFS SOMA (Miles)	8	10	7	7	25	30	-----	20	35+	45+	10	10	-----	

*Includes 112 acres ONA/ACEC at Manila Dunes (spruce forest)

Significant examples of such low elevation mixed evergreen forest are the King Range National Conservation Area, the Northern California Coast Range Preserve (a cooperative effort of The Nature Conservancy and the BLM), and Big Butte (most of which was included in the Yolla Bolly-Middle Eel Wilderness by the California Wilderness Act of 1984). The candidate old-growth reserves which evolved through the SYU 13 effort are listed under the descriptions of the various management areas. Preservation of old-growth mixed evergreen ecosystem would ideally include large integrated natural systems such as entire watersheds. In addition to the mixed evergreen, a large area would also have a diversity of other habitat types. There are few additional opportunities on Bureau lands in this area for establishment of large, fully integrated areas.

Old-growth forests differ from managed forests in function, structure, and composition. Besides providing specialized habitat for certain plant and animal species, the structural features of old-growth forests, (1) large live trees, (2) large snags, (3) large logs on land, and (4) large logs in streams are critical for maintenance of physical and biological stability in headwater streams, and play important roles in conserving and cycling nutrients and energy (Franklin, et al., 1981).

Timber Resources

The following table displays regional commercial forest land (CFL) acres and annual harvest by ownership. The region boundaries include the forest land in Del Norte, Humboldt, and Mendocino counties, including the Six Rivers and Mendocino National Forests.

<u>Landholder</u>	<u>CFL (Acres)</u>	<u>Annual Cut (MMBF)</u>
BLM	31,000	3.0
USFS	765,000	260.0
Private	<u>2,600,000</u>	<u>920.0</u>
Total	3,396,000 acres	1,183.0 MMBF

Note: USFS annual cut figures reflect the level of harvest identified by the Draft Forest Plan Preferred Alternative. Private annual cut figures and CFL acres are from California's Forest and Rangeland Publication (1988).

STATE INDEMNITY SELECTIONS

State claims to Federal land date back to policies adopted by the Federal Government shortly after the American Revolution. As new states were formed, Congress granted several sections in each township to the states to support the common schools. In California these were sections 6 and 36. It is Federal law that no land can be transferred until it has been surveyed. Before the surveys could be completed some of the school sections had been legitimately settled by private parties or reserved by the Federal government as national forests, Indian reservations, military and naval facilities, or for other various uses. States are allowed to select other lands in-lieu of lost lands if they wish, or they can wait for the reservations to be lifted. The states are constrained by both the acreage of the lost land or the monetary value of lost lands, whichever ceiling is reached first.

Currently, the State of California is due approximately 52,000 acres of indemnity lands, or acreage worth the monetary value of the lost lands. The value is between 3 million and 1.7 billion dollars depending upon the status of in-lieu land in the Elk Hills Naval Petroleum Reserve. The charter of the California State Lands Commission (SLC), which manages school sections, is to optimize revenues produced from the selected lands.

Several management areas in the Arcata Resource Area are of interest to the SLC, including about 20,000 acres of timber land. The SLC's interest in selecting lands under its in-lieu entitlement is of major concern to this planning effort.

MANAGEMENT AREA DESCRIPTION

SAMOA PENINSULA MANAGEMENT AREA

This management area consists of two parcels totaling 412 acres of public land managed by the Bureau. One is Samoa Dunes (300 acres) on the tip of the Peninsula west of Eureka, and the other is Manila Dunes (112 acres) west of Arcata. Both are coastal tracts which enjoy Pacific Ocean frontage. Approximately 197 acres of the Samoa Dunes parcel is public land under withdrawal to the U.S. Coast Guard. By Memorandum of Understanding (March 13, 1985), the BLM accepted management of 144 acres; about 52.5 acres will remain under withdrawal and will continue to be managed by the U.S. Coast Guard.

Recreation

Samoa Dunes is a popular recreation site for local residents because it is one of the few public beach access areas near Eureka. Recreational pursuits include ORV riding, target shooting, camping, fishing, surfing, hiking, and scientific study for an estimated 12,000 visitor days per year. ORV use has been estimated at 8,000 visitor days per year on the Samoa Dunes parcel. ORV use could increase about two-fold if the area is fully developed. A 125-acre off-road vehicle park is planned for this parcel (see the Conceptual Development Map, Appendix 3-1). The remainder of the area--roughly 175 acres--will be set aside and fenced to protect the area's sensitive botanical values and habitat, including the Menzies' wallflower. Only two ocean dune areas between San Francisco and Oregon are officially open to ORVs.

The Manila Dunes portion of the management area is also a popular recreation site for local residents. Approximately 4,500 visitor days of recreational use is estimated to occur each year and consists of ORV riding, camping, fishing, surfing, hiking, and scientific study. About two-thirds, or 3,000 visitor days, of the total visitor use is ORV related. The Manila Dunes and a naturally occurring spruce forest have been impacted by this use; signs have been posted by the local ORV clubs and BLM to prevent riders from traveling through these fragile areas. Most of the use occurs on long holiday weekends but light to moderate use occurs daily. As many as 300 vehicles have been observed on Memorial Day in the private camping area south of Manila Dunes.

Botanical Values and Sensitive Habitats

Samoa Dunes has about 40 acres of habitat for a BLM sensitive plant, the Menzies' wallflower (**Erysimum menziesii**), and 135 acres of wetlands and associated communities. Manila Dunes also has habitat for Menzies' wallflower, wetlands, open dunes, and a spruce forest. These wetlands are unique. An estimate by the California Department of Fish and Game shows about 90 percent of California historic wetlands have been destroyed. Both of these parcels are used by Humboldt State University and local schools as an environmental classroom and for research. The Nature Conservancy administers similar habitat on the 341-acre Lanphere-Christensen Dune Preserve, one-half mile north of Manila Dunes.

Menzies' wallflower is a Category 1 candidate species and is protected under BLM policy. It is a highly specialized plant, being restricted to dune systems along the coast in three known locations--Monterey, Ten Miles Dunes (near Fort Bragg), and Samoa Peninsula. The dune system, classified by Kuchler as Northern Seashore Community (**Elymus Baccharis**) is becoming increasingly rare. According to Kuchler there were originally only about 85 miles of this community along the coast in California. The community has been severely impacted by development, particularly in San Francisco, Monterey Bay, and Samoa Peninsula. The south spit and north spit (Samoa Peninsula) along Humboldt Bay was the longest continuous stretch of the Northern Seashore Community--almost 26 miles.

Currently, the BLM's goal for the entire Samoa Peninsula is to develop an overall strategy with other landowners for protecting the sensitive natural values while still providing ORV opportunities.

Wildlife

Wildlife species occurring in the Samoa Spit area include 86 species and subspecies of mammals and approximately 266 species of birds (Shapiro and Associates, Inc., 1980).

A cypress/eucalyptus grove of about 15 large trees is located on the southwest end of the Samoa Spit. This grove is used year-round by only a few species, however, it may be an important roosting and/or an important visual reference for migrating land birds. Migrating birds are thought to use the grove and then disperse to wetlands habitat where they feed.

California quail and a number of songbird species, especially sparrows and wrens, are common in the dune habitat. Marsh hawks and white-tailed kites forage over the dune areas. Large number of small mammals, such as deer mouse and western harvest mouse are also found in this habitat.

Wetland areas are used by shorebirds, waterfowl and wading birds for resting and feeding. The greatest use of these wetlands occurs during the winter and spring when the number of birds present in the Humboldt Bay area is greatest.

Four species of birds federally listed as endangered occur in the Humboldt Bay area. The brown pelican is a common summer and fall visitor to the Samoa Spit area. Southern bald eagles and Aleutian Canada geese are migrants through the area and the American peregrine falcon has been observed in the area. However, Bureau lands in the Samoa Spit area are not known to be critical habitat for these birds.

Cultural Resources

Cultural resources consist of one known prehistoric site (CA-HUM-684) which is not eligible for inclusion in the National Register of Historic Places (NRHP), and many historic features (lighthouse ruins, military bunkers, other facilities). Only the Life Saving Station is on the NRHP and it is the administrative headquarters for the Coast Guard. There are no identified uses by contemporary Native Americans. The only site of local significance is the ruin of Humboldt Harbor Lighthouse (CA-HUM-662H), and the Humboldt Bay Maritime Museum, Inc., has expressed some interest in stabilization and interpretation of the site.

Minerals

There is no record of past or present mineral activity within the management area. Natural gas and oil are present as seeps southeast of the area in the Rio Dell formation which underlies the Samoa Peninsula, so there is potential for oil and gas. The area is presently under lease, however. Other than oil and gas, there are no known minerals of local or regional significance.

LACKS CREEK MANAGEMENT AREA

This management area has about 4,500 acres of Federal surface and 500 acres of mineral reserve lands. Most of the area is in the Redwood National Park Protection Zone. See explanation under Timber below.

Timber

Within the approximately 4,500 acres of public land in the Lacks Creek Management Area there are about 4,300 acres of forest land classified as commercial forest land (CFL). About 1,100 acres of this 4,300 acres is withdrawn from the timber base for protection of fragile sites, steep slopes, and riparian values. The timber lands are primarily Douglas-fir (*Pseudotsuga menziesii*) and mixed hardwoods.

There is an estimated 32 MMBF of commercial timber and 7,000 cords of hardwood on the 3,200 acres of available CFL and 30 MMBF on those lands withdrawn from the timber base. Under the current ten year forest management plan (SYU 13), the Bureau annually offers for sale about 0.5 MMBF of commercial timber for the market. No fuelwood has been sold from this management area.

The commercial forest land is site class III and IV, with fairly good reforestation and growth potential. If fully stocked, the 3,200 acres of commercial forest land could support about 91 MMBF of commercial timber. The average timber volume on Bureau lands is about 28 MBF per acre.

Using investment guidelines from the BLM Oregon State Office (Oregon State University Publication, Research Paper 23, 1974) the economic viability for timber management in this area is moderate. A benefit/cost ratio of 1.49 to 1 can be achieved for timber harvest operations. About 2,100 acres of the 4,300-acre commercial forest land base have been identified for stand improvement or intermediate cuts, including precommercial thinning and brush and hardwood control.

Reforestation investments involved with backlog reduction on available timber land average about \$216.00 per acre; investment guidelines show an average maximum investment of \$253.00 per acre can be allowed for economically feasible reforestation expenditures. This represents a better than average investment opportunity for getting the available commercial forest land into production.

A 10-year moratorium initiated in 1981 with Redwood National Park, puts an abeyance on timber harvest in the Lacks Creek watershed. The purpose of the moratorium was to allow time for the Park to acquire baseline data within the Redwood Creek watershed. Even after the moratorium expires, timber management activities will be carefully planned due to the sensitive nature of the Redwood Creek watershed.

Old-Growth Characteristics

About 800 acres of the Management Area's 4,500 acres are designated for an old-growth reserve. The purpose of the reserve is to maintain regional biological diversity, conserve plant and animal genetic stock, protect scarce organisms, and provide for scientific research. Using criteria developed by the Ukiah District Office, analysis of this candidate reserve indicates there are 190 acres of old-growth timber scattered in small pockets ranging from about 10 to 60 acres.

An adult spotted owl was observed in the reserve and a juvenile owl which fledged from a nest in the Six Rivers National Forest was detected in 1984. In the spring of 1987, Bureau field inventory located one pair and one single male spotted owl on public land in the management area. However, no nest sites have been found in the management area.

Wildlife

Species occurring in this management area include the spotted owl and associated old-growth species, salmon and steelhead, black-tailed deer, and black bear. Black bear are very common in the area and hunting pressure for them is high. For spotted owl observations include one pair and a lone male found in May 1987.

Potential for public lands in the Lacks Creek drainage is to serve as enclaves of habitat for wildlife species that prefer old-growth/mature forests.

There is approximately one mile of anadromous fish habitat in Lacks Creek on Bureau lands in the management area.

Public lands in Lacks Creek could provide a critical stepping stone to link protected spotted owl populations on the Six Rivers National Forest with populations on Redwood National Park lands. This owl stepping stone could help maintain the biological integrity of spotted owls in Northern Humboldt County. However, the interdependency of these birds on Bureau land in the Lacks Creek Management Area is unknown.

Most of the old-growth forests on private lands between the Six Rivers National Forest and the Redwood National Park have been harvested. The only significant old-growth remaining in this area is on BLM public lands in Lacks Creek drainage.

Recreation

Recreation consists of deer, bear, and pig hunting, estimated at 250 visitor-days per year. Sightseeing and ORV use account for about 100 visitor-days each per year. The area is remote, little known, and near national parks and forests with more significant recreational opportunities. Lacks Creek is the salmonid stream in the management area, but is closed to salmon and steelhead fishing for protection of spawning habitat.

Cultural Resources

The likelihood of finding significant prehistoric values on public lands is low because of very steep slopes. Significant prehistoric values do occur on the top of Pine Ridge, east of public lands; contemporary Native Americans collect floral resources on Pine Ridge, again, not on public lands. There are no known historic features of value.

Minerals

Currently, there are no mineral leases, claims, or prospects on public lands, and little, if any, mineral activity has ever occurred. Prospects for chromium, manganese, gold, copper, limestone, sand, gravel, and stone are located in the region along the major geologic trend and in similar formations as Lacks Creek; this suggests some potential for these minerals in the management area, but minerals are of little economic significance with very little chance of development in the near future.

BUTTE CREEK MANAGEMENT AREA

This management area has about 2,500 acres of Federal surface and about 1,500 acres of mineral reserve land.

Timber

Within the approximately 2,500 acres of public land in the Butte Creek Management Area there are about 2,100 acres of forest land classified as commercial timber land. One hundred acres of this 2,100 acres is withdrawn from the timber base for protection of riparian lands, and because of steep slopes or unstable soils. Thus, there is an available commercial timber land base of about 2,000 acres in this management area.

The 2,100 acres of commercial timber land is roughly divided into two areas. The Butte Creek block has about 1,235 acres of commercial timber land while the Larabee Butte block has about 865 acres of commercial timber land.

The Butte Creek Management Area has some of the highest site Douglas-fir forest lands in the Arcata Resource Area, with Site Classes II and III predominate. The economic viability of this area for timber production is high. If fully stocked, the 2,000 acres of public commercial forest land could support about 85 MMBF of commercial timber. The average timber volume on Bureau lands is about 42 MBF per acre.

The 2,000 acres currently supports approximately 53 MMBF of commercial timber and 8,000 cords of hardwood. Under the current 10-year forest management plan (SYU 13) the Bureau annually offers for sale about 0.85 MMBF of commercial timber for the market. Of the 0.85 MMBF, approximately 0.45 MMBF is in the Butte Creek block, while 0.40 MMBF is in the Larabee Butte block.

A benefit/cost ratio of about 2.0 to 1 can be achieved for timber harvest, and there is a better than average investment opportunity for getting cutover forest land back into production. Over 300 acres have been identified for stand improvement and intermediate cutting. This includes about 100 acres of precommercial thinning, 60 acres of grass control, and about 160 acres of brush and hardwood control. Access is acquired and a large investment has already been made in roads, bridges and forest development.

Old-Growth Characteristics

About 360 acres in the Butte Creek block are in a candidate old-growth reserve. The purpose of the reserve is to maintain regional biological diversity, conserve plant and animal genetic stock, protect scarce organisms, and provide for scientific research. The 360 acres are mature/old-growth forest. There are four breeding pairs of spotted owls within the management area; all four pairs were nesting in 1986 and there is a high degree of nesting success. There is one known goshawk nest in the area. This is the most significant area within the management area for protection and study of old-growth dependent wildlife species. The Butte Creek block is a textbook example of old-growth forest as defined by the study team of The Nature Conservancy.

Wildlife

The Butte Creek management area is an excellent example of low elevation old-growth Douglas-fir forest hosting populations of old-growth dependent wildlife species. Among these are four spotted owl breeding pairs.

Spotted owls are also found within the State Park 8 miles west, and on Forest Service land 8 miles to the east. The interdependency of these birds on bureau old-growth forests in the Butte Creek management area is unknown.

There is presently one known location of goshawk nests in the Butte Creek block and one nest site in the Larabee Butte block.

Recreation

Recreation consists of very limited hunting and sightseeing. The area is remote, small, and near national forests which offer more significant recreational opportunities. There are about 400 visitor days, to the area, 200 of which are hunters, 100 from OHV use, and 100 from other uses, such as sightseeing.

Botanical Values

Listera cordata (heart-leaved tway blade) occurs in the candidate old-growth reserve. It is considered by the California Native Plant Society to be of limited distribution (List 4), but is not listed or a candidate for listing by the U.S. Fish and Wildlife Service, so is not protected by BLM policy.

Cultural Resources

Eight field inventories for cultural resources have been conducted in the management area with negative results. Potential for finding historic properties is low.

Minerals

Currently, there are no mining claims or mineral leases in the Butte Creek management area. Several manganese prospects and mines, one gold mine, and a chromite prospect are located in the general region but outside Bureau lands. The southern portion of this area is classified as prospectively valuable for coal. There is very little mineral resource significance at present; only manganese and gold have some likelihood for future development; coal resources are too low in quality for development.

KING RANGE VICINITY MANAGEMENT AREA

This management area totals about 3,900 acres and consists of three blocks of public land contiguous to the King Range National Conservation Area (Prosper Ridge, Bear Trap Ridge, and Bear Creek), and about fifteen small parcels between the King Range and the Mattole River. The contiguous blocks had been acquired through King Range exchanges. Recently, the smaller tracts have been used for disposal for King Range acquisitions.

Timber

There are about 3 MMBF of standing volume on an available commercial forest land base of nearly 2,600 acres. Overall, standing volume per acre is low, and there is a large backlog in forest development due to logging and wildfires. If fully stocked these stands would support a timber volume of about 80 MMBF. About 2,400 acres have been identified as needing stand improvement work. The commercial forest land averages Site Class IV. Steep slopes, vegetation competition, and other factors contribute to a marginal timber management program.

Wildlife

There are no known populations of sensitive animal species on public land in this management area. The most significant wildlife values are salmonid spawning areas in the Bear Creek watershed. The 40-acre Eubanks Creek parcel has Mattole River frontage and is an important salmonid spawning section of the main stem of Eubanks Creek. These areas are very important in restoring the Mattole River to its former status as a highly productive salmon and steelhead producing river.

Recreation

Recreational opportunities on these lands are overshadowed by the proximity to the King Range National Conservation Area (KRNCA) and to the Sinkyone Wilderness State Park which have significant opportunities for primitive recreation. Public lands adjacent to the King Range could supplement hiking and primitive-type recreation pursuits within the King Range, and tracts contiguous to the Sinkyone Park have value for consolidation of State Park lands. Recreation use consists primarily of hiking, hunting, sightseeing, driving for pleasure, and is estimated at 1,250 visitor days per year.

Botanical Values

There are no known populations of sensitive plant species in this management area. The potential for finding leaf reed grass (*Calamogrostis foliosa*) exists as its habitat is found on nearby lands. This grass is a BLM sensitive species. The potential for unique botanical values is limited.

Cultural Values

Riparian benches, particularly at confluences, and large upland flats hold a potential for prehistoric archaeological sites. In contrast to the coastal portion of the KRNCA, very little inventory has been conducted in the interior of this management area. Historic features of local interest include roads and homestead sites. Very little is known about the ethnographic or current use and significance of this area due to radical depopulation of native groups in the historic period.

Minerals

There are several oil and gas leases and a few lode claims on or near public lands in this management area. There are known deposits of zinc, lead, silver and copper nearby, although not in the management area. Manganese prospects are common, but manganese occurrences are likely to be small and discontinuous and it is doubtful that economic deposits exist. The area is prospectively valuable for oil and gas; the low permeability and porosity of the geologic formation, and high degree of shearing and vertical fracturing do not indicate a favorable environment for significant oil and gas reservoirs. Overall, the significance of mineral resources is low and it is unlikely that development will occur in the foreseeable future.

Visual Resources

The King Range area has long been recognized as one of the most unique and scenic stretches of the California coastline. The rugged and remote landscape has seen few intrusions. The BLM's Visual Resource Management system rates this as a landscape of high scenic quality along the coastline and the Mattole River Valley. The coastal slope is designated VRM Class 2, which precludes management activities from being evident in the characteristic landscape. Most of the coastal streams between Shelter Cove and the Mattole River are managed by BLM.

RED MOUNTAIN MANAGEMENT AREA

The Red Mountain management area consists of about 34,300 acres of Federal surface and about 14,000 acres of mineral reserve land.

Timber

An estimated 105 MMBF of Douglas-fir/Ponderosa pine timber and 75,000 cords of hardwood occur on about 16,700 acres of commercial forest land. This equates to an annual allowable cut of 1.7 MMBF of timber. About 250 cords of firewood are sold annually. The majority of the commercial forest land is Site Class III and IV, and about 13,900 acres are in need of some form of forest development work

(planting, precommercial thinning, brush and hardwood control). If fully stocked the commercial forest land would support 370 MMBF of timber. With the standing volume and specific characteristics of the timber stands (site class, topography, logging systems, hardwood domination), and lack of access to several parcels, the economic viability of this management area is considered marginal. A benefit/cost ratio of about 1.35 to 1 can be achieved for timber harvest operations.

Reforestation investments, mainly backlog reduction (hardwood conversion and control), will average around \$317.00 per acre. Investment guidelines show an average maximum investment of \$256.00 per acre can be allowed for economically feasible reforestation expenditures. Therefore, reforestation efforts will be concentrated on those sites that will offer a higher, more cost-effective return on the investment. The use of herbicides and other low cost forest development methods could be used to reduce the cost per acre.

Wildlife and Old-Growth Characteristics

Wildlife species of highest interest include the bald eagle, peregrine falcon, and spotted owl. Bald eagles use the South Fork of the Eel River and Cedar Creek because of the anadromous fish as a food source; no nesting has been discovered. The peregrine falcon, an endangered species, nests on private land in four locations in the management area. Known spotted owl locations are a roosting area on private land near the Northern California Coast Range Preserve (NCCRP)--first seen in 1977; no observations in 1984 or 1985. Spotted owls have been located in Cedar Creek several times including a breeding pair in May 1987. BLM inventory of the Charlton Creek/White Slide area in 1987 located 1 pair of spotted owls and 1 individual. No nesting sites were found.

There are three candidate old-growth reserves in the management area totaling 2,700 acres. All have been inventoried for their old-growth values. Cedar Creek (800 acres) is within the existing Red Mountain Research Natural Area/Area of Critical Environmental Concern (RNA/ACEC) and has 180 acres of old-growth timber. Charlton Creek/White Slide area (1,100 acres) has an estimated 600 acres of old-growth forest. Jewett Rock (800 acres) lacks substantial old-growth forest and other reserve characteristics. Other old-growth species found include the chestnut-backed chickadee, hermit thrush, pileated woodpecker, red tree mouse, and flying squirrel.

Cedar Creek is a major tributary of the South Fork of the Eel River and has valuable riparian habitat. It is a significant steelhead spawning and fish rearing stream; some use of this stream by both King and Silver salmon has also been noted. Of special importance is the fact that during low flow periods the flow contribution of Cedar Creek is much larger than the relative size of its watershed would indicate. The Cedar Creek watershed represents six percent of the South Fork of the Eel River watershed above Leggett, whereas at low flow Cedar Creek contributes about 17 percent of the flow at Leggett. Low flow levels are critical to the survival of juvenile steelhead.

Deer occur throughout the area but opportunities for public hunting are very limited due to lack of access.

Recreation

Recreation in the management area includes dispersed hiking, hunting and fishing, with an estimated 4,500 visitor days of use per year. Cedar Creek has a population of small trout that sustains light fishing pressure; however, the creek is a steelhead nursery stream and fishing is not encouraged.

Approximately 14 miles of the South Fork Eel River within the management area have been federally designated as part of the National Wild and Scenic Rivers System.

About 8 of the 14 miles of the river between Elkhorn Ridge and Brush Mountain are designated "wild," while the remaining 6 miles are designated "recreational." Approximately 5 miles of the "wild" portion and less than 2 miles of the "recreational" portion are bounded by Bureau lands.

In general, public lands do not offer significant recreational opportunities for the public. Sightseeing is an important activity to visitors driving along Highway 101. Public lands seen from this road include Elkhorn Ridge, Brush Mountain, portions of the South Fork Eel River, Shell Rock, and the east slope of Cahto Peak.

Special Areas

The Northern California Coast Range Preserve is one of only 152 Biosphere Reserves (UNESCO's Man and the Biosphere Program) in the world. It contains about 7,500 acres. It contains some of the largest stands of old-growth Douglas-fir (mixed evergreen) forest left in California. The Nature Conservancy owns about 3,900 acres and the BLM administers about 3,600 acres of the Preserve. It is also designated a National Natural Landmark by the U. S. Park Service, and a Hydrologic Benchmark by U.S. Geological Survey. It was designated as a Research Natural Area and Area of Critical Environmental Concern (RNA/ACEC) by the BLM in 1981.

The ultrabasic soils in the 7,000-acre Red Mountain RNA/ACEC support the endangered plant McDonald's Rockcress (*Arabis mcdonaldiana*), and three sensitive plants (*Silene campanulata* spp. *campanulata*, *Sedum laxum* spp. *eastwoodiae*, *Eriogonum kelloggii*). Red Mountain is the range extension of four species and the type locality for nine taxa. The red soils are derived from ultrabasic igneous intrusions which are prized for these botanical values, soils research and three strategic minerals. Most of the RNA/ACEC is a wilderness study area.

Cultural Resources

There is a high probability for prehistoric archaeological sites on Mail Ridge and within portions of the major riparian corridor. There is moderate potential for archaeological resource on top of Red Mountain, Elkhorn Ridge, Brush Mountain, Cahto Peak, and the South Fork Eel River corridor. The balance of the area has low potential for archaeological properties. No sites of known historic value have been identified on public lands in this management area. Native American residents of the Laytonville Rancheria have expressed some interest in access to Cahto Peak and ownership of public land; no specific geographic values or issues have been identified.

Minerals

The mineral potential of Red Mountain includes chromium, nickel, and manganese, and has been well documented for over a century. The Island Mountain Mine to the east produced one million pounds of copper, the only copper producer in the northern Coast Range. Prospects for clay, coal, and limestone are located in the management area, and oil and gas exploration has occurred. One thermal spring (temperature unknown) is located in the area. Only on Red Mountain is there slight potential for mineral production to occur. There is very low potential for oil, gas, and coal, and there are no indications other than one thermal spring to suggest economic geothermal potential.

COVELO VICINITY MANAGEMENT AREA

The Covelo Vicinity management area has about 66,500 acres of Federal surface and 30,000 acres of mineral reserve land.

Timber

An estimated 89 MMBF of Douglas-fir/Ponderosa pine/white fir timber and 65,000 cords of hardwood occur on 9,400 acres of commercial forest land. This equates to an annual allowable cut of 1.3 MMBF. The majority of the commercial forest land is Site Class III and IV. If fully stocked the commercial forest lands would support 220 MMBF of timber. A benefit/cost ratio of 1.56 to 1 can be achieved for timber harvest, and most of the tracts with commercial forest land have access.

Reforestation investments would be about \$365.00 per acre and guidelines show an average maximum investment of \$293.00 per acre; this represents a marginal operation for returning commercial forest land to production. About 1,400 acres, mostly on Brushy Mountain, have been identified as needing forest development work, mostly as a result of past wildfires. Use of herbicides and other low cost methods would reduce development costs.

Wildlife

There are several wildlife species of interest in the management area. The bald eagle feeds on salmon carcass along the Eel River in the fall and spring; no nesting sites are known. Two peregrine falcon nest sites are found in the management area on adjacent private land. One is near Eden Creek southeast of Covelo and the other near Mina, north of Covelo. These falcons use public lands for foraging. Spotted owls are found in the Hulls Creek area.

Recreation

Recreation use consists primarily of deer hunting in the Thatcher Ridge area, accounting for an estimated 500 visitor days per year. Rafting and kayaking occur along portions of the Eel River. Other recreation activities such as driving for pleasure/sightseeing, off-road vehicle use, and fishing amount to only about 500 visitor days because of limited public access.

The main stem, and both the North Fork and Middle Fork of the Eel River are federally designated as a Wild and Scenic River. The total length of this designation is about 110 miles. Approximately 3 miles of the main stem, 3 miles of the North Fork and 5 miles of the Middle Fork pass through BLM lands. Visitor use on these portions of the river is primarily from boating, and is estimated at 150 visitor days per year.

Large, private hunting clubs, and the proximity of the Six Rivers and Mendocino National Forests overshadow recreational opportunities on public lands. Total annual recreation use on public lands in the management area is estimated to be less than 1,000 visitor days.

Special Areas and Old-Growth Characteristics

Spotted owl locations consist of two individuals (breeding status unknown) near Thatcher Ridge. A candidate old-growth reserve at Hulls Creek was inventoried in 1987 for wildlife. An individual male spotted owl was found. Two other male individuals have been sighted previously. The reserve is estimated to have 300 acres of old-growth timber. Another tract of interest, Little Darby east of Willits, is managed as a public environmental education (day use) area. School groups visit the area in the spring. Little Darby does offer natural values such as old-growth Douglas-fir (including the tallest known Douglas-fir on public lands in the Ukiah District), chaparral vegetation, riparian habitat, and diversity of bird species.

Botanical Values

The most significant botanical values in the management area include an extensive stand of Sargent cypress, and the BLM sensitive plant species *Pogogyne douglasii* var. *parviflora* which are found in the Eden Creek area. The cypress is recovering from defoliation by the silver spotted tiger moth. This is unique, in that, rarely is such an infestation allowed to run its course without human intervention.

Cultural Resources

Archival and field inventories conducted in this management area indicate substantial prehistoric and ethnographic land use. Ethnographers have identified several Pitch Wailaki village sites along Casoose Creek and North Fork Eel River, many of them on public land; the present condition of these sites has not been assessed. Prehistoric sites are also known for the Middle Fork Eel and the Big Butte vicinity. Generally, public lands within this management area are of low archaeological sensitivity, because of the rugged terrain; however, moderate potential for sites exists at upland areas east and northeast of Eden Valley and Brushy Mountain, and high potential exists along riparian terraces, especially at confluences.

There have been only limited attempts to identify historic or Native American values for the area because of the active historical use of the Round Valley vicinity and of the presence there now of the Round Valley Indian Reservation, the potential for such values seems high.

Minerals

There are no mineral leases on the subject lands, but some mining claims have been located. This portion of Mendocino County was one of the largest producers of manganese in California and the area has numerous manganese prospects and past producing mines. Manganese occurs largely on stratabound deposits of manganese dioxide in Franciscan chert, and while the deposits are limited in size and some deposits have been mined out, the area is geologically favorable for manganese and has economic potential for this mineral. Chromite has been mined in two locations, and the area has very little potential for copper. Portions of the area are rated prospectively valuable for coal, geothermal, oil and gas, and carbon dioxide, however, the potential is low for oil and gas, carbon dioxide, and geothermal, and moderate for coal.

SCATTERED TRACTS MANAGEMENT AREA

This management area is comprised of small, isolated tracts of public lands in Humboldt, Trinity, Mendocino, and Sonoma Counties. There are over 80 individual tracts of Federal surface management totaling about 15,500 acres, and numerous mineral reserve land (MRL) tracts with concentrations of MRL in Sonoma County west of Lake Sonoma, Mendocino County on Pine Ridge west of Ukiah, and Humboldt County north of King Range.

Timber

The only areas with any economic potential for timber management are the four major blocks: Laqua Buttes/Big Bend, Gilham Butte, Pine Ridge, Montgomery Woods. These four blocks total 7,500 acres with about 3,700 acres of commercial forest land included in this total. The entire management area has about 6,200 acres of commercial forest land. There is an estimated 108 MMBF of timber and 50,000 cords of hardwood on these tracts, equating to an annual cut of 1.7 MMBF. However, only 3,700 acres, 85 MMBF, are economically available for harvest; this equates to an annual allowable cut of 1.4 MMBF. The majority of this land is Site Class III and IV. When fully stocked these stands would support 130 MMBF of timber.

About 2,100 acres have been identified as needing forest development work. Reforestation investment analysis shows a negative proposition for improving stocking. The economic viability of managing scattered forest land parcels has always been a concern. Travel expense, access difficulties, and the small number of acres have limited the BLM to custodial management. The relatively recent subdivision of timber industry lands and ranches into rural residential lots has made timber management more complex. The number of landowners from which to secure easements has dramatically increased and the residents' desire for rural peace-and-quiet constrains timber management activities.

Wildlife and Old-Growth Characteristics

Single spotted owls have been observed at Laqua Buttes (1984) and a breeding pair was discovered in 1987. A pair of spotted owls was also sighted at Gilham Butte in 1987, but breeding in this area has not been recorded. Eagle Peak, and Greenough Ridge, west of Ukiah, are near known peregrine falcon nesting sites.

Three candidate old-growth reserves are in this management area totaling 2,110 acres: Gilham Butte, laqua Buttes, and Big Bend. Of the three prospects, laqua Buttes (390 acres), has the highest potential for inclusion in a thematic old-growth system based on inventory standards; it has 185 acres of old-growth timber, perennial water, and its location makes it relatively valuable as a biological outpost. Big Bend (280 acres) has little potential because of limited acreage. Gilham Butte (1,320 acres) has 390 acres of old-growth timber, but has limited perennial water and has a moderate diversity of flora and fauna typically found on other candidate reserves. However, given its overall size (2,550 acres), quality of its old-growth stands and its location at the headwaters of four major drainages, Gilham Butte can be categorized as having obvious old-growth values.

Recreation

Recreational pursuits in the scattered tracts management area are generally limited to casual use by surrounding landowners or hunters. Most of the tracts are relatively small, steep, forested upland parcels with no public access. The area of The Cedars, a unique geologic outcrop in Sonoma County west of Healdsburg, has been identified on preliminary maps by the Sonoma County Planning Department (which is revising/updating the County general land use plan) as a potential park.

Some parcels, such as Goat Rock, are only of local recreational interest. This tract contains a large rock outcropping and huge boulders in the river. A small trail leads from Highway 36 to sunbathing areas and fishing holes. The Weitchpec parcel has public access from Highway 96 and leads to two fishing holes. Recreation use of both parcels are overshadowed by their proximity to National Forest lands. While portions of the Eel River are designated wild and scenic (see "Covelo Management Area" discussion) only four small Bureau tracts are located on the river. There is public access to these tracts. A trail connecting the Humboldt Redwoods State Park, Gilham Butte, and King Range has been suggested through the years. A hiking/horseback trail is partially complete, located in the northern portion of the Gilham Butte block. There is no public access, but some visitors from Humboldt Redwoods State Park hike or ride horses into Gilham Butte from the park. Because of the small, widely scattered nature of the public lands in this management area, and the relative proximity of National Forest lands, there is little justification to attempt active recreational management of any of these parcels.

Botanical Values

Significant botanical values are limited to The Cedars, which has two BLM sensitive plant species (two subspecies of *Streptanthus morrisonii*), and Bear Buttes (north of Garberville) which was the site of *Astragalus agnicidus* (presumed extinct). Determination of the significance of the *Streptanthus* at The Cedars is awaiting completion of "The Geysers Streptanthus Study." Bear Buttes will be thoroughly inventoried for the *Astragalus* before final disposition or use.

Cultural Resources

The broad geographic distribution of these parcels defies categorization of cultural resources. As a whole these parcels could be considered of low sensitivity because of their generally rugged character. The only tracts which have a high potential for extant cultural resources are located on the Eel River between Dos Rios and Kekawaka. Moderate potential exists at the confluence of perennial streams, e.g., Mattole Canyon and Cameron Creek, or atop major trending ridges, for example, Pine Ridge and Irene Peak.

Minerals

As discussed under other management areas, localized potential for manganese and oil and gas does exist throughout the area. Little, if any, development of these resources is likely to occur in the foreseeable future.

TABLE 3-2

FORESTRY STATISTICS

MANAGEMENT AREA	TTL CFL ACRES	(TPCC/MFP)		AVA. CFL		STD VOL.*				ANN. A.C.*				OLD		VOL.		ACRES PLNTD. MMBF
		W/D	CFL	PRE.	PRO	NO.	PRO	NO.	PRO	TTL	SZ	GROW. 1/ DIST.	VOL. REM.					
PRE RMP PRO ACT.		acres	acres	acres	mmbf	mmbf	mmbf	mmbf	mmbf	mmbf	mmbf	mmbf	mmbf	acres	acres	acres		
1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	acres		
LACKS CREEK	4,205	990	1,090	3,215	3,115	32	32	32	32	.5	.5	.5	.5	190	190	25	450	
BUTTE CREEK	2,206	178	2,206	2,028	0	53	26	0	0	.85	.40	0	0	360	360	30	760	
COVELO	17,350	7,950	7,950 (17,350)	9,400	9,400	89	70	89	70	1.4	1.1	1.4	1.1	3,165	10-800 2/	30	500	
RED MOUNTAIN	23,425	7,405	8,105	16,720	16,020	105	91	91	91	1.7	1.5	1.5	1.5	380	10-80 3/	45	1,900	
SCAT. TRACTS	7,455	1,305	6,255 (7,455)	6,150	1,200	108	18	41	18	1.7	.7	1.7	.3	700	25-400 4/	20	0	
K.R. VICINITY	2,725	165	1,065	2,560	1,660	--	--	--	--	0	0	0	0	--	--	--	--	
TOTAL	57,366	17,993	27,871	40,053	31,395 (20,795)	387	260	253	211	6.15	4.2	4.1	3.4	4,595	--	150	3,610	

1/ Based on TNC (Nature Conservancy) inventory and analysis and BLM inventories where TNC data was not taken.

2/ Big Butte, White Rock Creek, Travis Ranch, Brushy Mtn., Willis Ridge, Hulls Creek.

3/ Cedar Creek, Charlton Creek.

4/ Iaqua & Gilham Buttes, Montgomery Woods.

* Annual A.C. figures are divided as follows: Column 1 is the allowable cut in 1985 (Pre-RMP); Column 2 is the A.C. as outlined by no action alternative in the PRMP; Column 3 is the proposed action allowable cut available to the market. The fourth Column is the Arcata Resource Area actual allowable cut for the next decade.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter analyzes the environmental impacts of the management alternatives presented in Chapter 2. Since the alternatives describe overall management emphasis, and do not propose specific, on-the-ground projects or actions, the environmental consequences of the alternatives are identified in comparative, general terms. In most cases, subsequent analysis will be required to implement resource management decisions. More detailed or site-specific studies will be conducted in compliance with the National Environmental Policy Act and its implementing regulations as the need arises.

The impact analysis focuses on the issues and management concerns described in Chapter 1. Impacts are discussed by issue for each management area. Under each issue, alternatives are covered in the same order they are presented in Chapter 2. A cumulative impact analysis for the entire Planning Area follows this discussion on page 4-18.

The allowable cut and standing volume figures expressed in this chapter are strictly for planning analysis and impact comparison purposes only. These numbers represent what can be available to the timber market through BLM timber sales or private (acquired land) timber sales. Discussions of "long-term" effects represent one rotation or more (75 to 110 years) and assume normal stand stocking, conservative estimates of growth, and in some cases the acquisition of certain amount of commercial forest land (CFL). Average volumes-per-acre in each management area were used to calculate these figures. Short-term standing volume or allowable cut figures were based on actual inventory data projected up to one rotation. The average volume-per-acre figures were derived from these data.

Impact summary tables at the end of Chapter 2 provide comparative analyses of these alternatives and their impacts on the issues selected for analysis by management area (Tables 2-1 through 2-7). Table S-1, p. x, provides a comparative analysis of these alternatives for the entire Planning Area.

The changes described in detail in Chapter 2 have also been incorporated into the environmental impact analysis which follows and the impact summary tables. In addition to these changes, the CUMULATIVE IMPACTS Section (p. 4-18) has been revised to reflect a more regional perspective.

The revision provides additional information regarding cumulative impacts on spotted owl, old-growth, and availability of timber to market, but does not alter the conclusions of the DEIS. Acreage totals are recalculated to reflect corrections for individual management areas.

MANAGEMENT AREA IMPACTS

SAMOA PENINSULA MANAGEMENT AREA

Impact on Off-road Vehicle (ORV) Recreation Use Levels

No Action (Proposed Action)

The NO ACTION (PROPOSED ACTION) allows controlled ORV use on Samoa Dunes and limited use on Manila Dunes. Current motorized recreation use on Samoa Dunes is estimated at 8,000 visitor days per year. This use will benefit from the development of the 125-acre off-road vehicle park proposed for Samoa Dunes increasing ORV use to about 17,000 visitor days per year over the next ten years. The closure of 175 acres of the Samoa Dunes to motorized vehicle use will adversely affect off-road vehicle recreation opportunities. The loss of these opportunities, however, will be offset by the recreational developments already discussed.

On Manila Dunes, current ORV use is estimated to be 3,000 visitor days annually. By limiting vehicle use to predominately unvegetated areas, motorized recreation opportunities will be adversely affected because of the reduced amount of land open to ORV use. The number of riders at Manila Dunes will decrease from 3,000 to about 1,500 visitors per year. As a result, a greater demand for and increased ORV use of the Samoa Dunes will occur.

Enhancement of Natural Values Alternative

Impacts to ORV recreation use levels on the Samoa Dunes portion of the management area under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would be essentially the same as those for the NO ACTION ALTERNATIVE--use would increase from 8,000 visitor days to nearly 17,000 visitor days as a result of developing the off-road vehicle park and greater demand to use this area due to the closure of motor vehicles use on private lands. On the Manila Dunes portion, however, ORV use would be prohibited over the entire area eliminating ORV recreation use opportunities altogether and the 3,000 visitor days of motorized recreational use currently estimated to occur.

Recreation Enhancement Alternative

The RECREATION ENHANCEMENT ALTERNATIVE is designed to actively promote ORV use on the two parcels of public land. Under this alternative, an off-road vehicle park would be developed on Samoa Dunes. As a result, ORV recreation use would significantly benefit, increasing the amount of ORV use on the Samoa Dunes from the 8,000 visitor days currently estimated to occur to nearly 17,000 visitor days and from 3,000 visitor days to nearly 5,000 visitor days on the Manila Dunes over the next ten years. Unauthorized vehicle use outside the management area is also likely to increase but would be restricted by posting boundaries and increasing patrols in the area. The Manila Dunes will be opened to motorized vehicle use which would also benefit ORV recreational use.

Administrative Adjustments Alternative

Impacts to ORV recreation use levels on the Samoa Dunes portion of the management area under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would be essentially the same as those for the NO ACTION ALTERNATIVE--use

would increase from 8,000 visitor days to nearly 17,000 visitor days primarily as a result of developing the off-road vehicle park. On the Manila Dunes, motorized recreation opportunities would be adversely affected because of the reduced amount of land open to ORV use. The number of riders at Manila Dunes would decrease from 3,000 visitor days per year to about 1,500 visitor days. As a result, a greater demand for and increased ORV use of the Samoa Dunes will occur.

Impact on Botanical Values (Including Wetlands) and Passive Recreation

No Action (Proposed Action)

The NO ACTION (PROPOSED ACTION) provides for the protection of wetlands and Menzies' wallflower and the enhancement of passive types of recreation. Under this alternative, 175 acres of land in the Samoa Dunes area will be closed to motorized vehicles and 65 acres closed in the Manila Dunes area, thereby reducing the noise and surface disturbance associated with this use. This will benefit the area's botanical values and enhance nonmotorized recreation uses such as hiking, camping, sightseeing, etc. Designation of the Manila Dunes as an Outstanding Natural Area (ONA)/Area of Critical Environmental Concern (ACEC) will focus greater attention on the area's natural values and serve to further enhance these values.

The ORV recreational facility planned for the Samoa Dunes will increase the amount of ORV use in the management area, but fencing of sensitive habitat, increasing patrols, more field monitoring, and posting boundaries will minimize any adverse impacts.

Enhancement of Natural Values Alternative

The ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would prohibit ORV use on the Manila Dunes portion of the management area, moderately benefitting the area's botanical values and passive recreation opportunities. The impact on these values and opportunities in the Samoa Dunes portion under this alternative would be the same as those for the NO ACTION ALTERNATIVE. The ORV park planned for the area would be developed and ORV use would increase from 8,000 visitor days per year to 17,000 visitor days. However, any adverse impacts that might result from increased vehicular use would be minimized by fencing the 175 acres of sensitive plant habitat, increasing patrols, monitoring, and interpretive educational activities, and posting the boundaries of the project area.

Recreation Enhancement Alternative

Under the RECREATION ENHANCEMENT ALTERNATIVE, the Manila Dunes would be open to motorized vehicle use. As a result the existing Menzies' wallflower population would be virtually eliminated and wetland habitat areas would be moderately impacted. Passive recreation opportunities would decrease in quality but would continue at or near present levels. Impacts to botanical values and passive recreation opportunities on the Samoa Dunes would be the same as those described in the NO ACTION and ENHANCEMENT OF NATURAL VALUES ALTERNATIVES.

Administrative Adjustments Alternative

Like the NO ACTION ALTERNATIVE, the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE also provides for the protection of wetlands and Menzies' wallflower and the enhancement of passive types of recreation. Under this alternative, 175 acres of land in the Samoa Dunes area would be closed to motorized vehicles. Roughly half of this land is slated for disposal, but would remain closed to motorized vehicle use. Motorized vehicles would be limited to mostly unvegetated areas in the Manila Dunes, thereby reducing the noise and surface disturbance associated with this use. These actions would benefit the management area's botanical values and enhance nonmotorized recreation uses such as hiking, camping, sightseeing, etc. Designation of the Manila Dunes as a ONA/ACEC would focus greater attention on the area's natural values and serve to further enhance these values.

The ORV facility planned for the Samoa Dunes would increase the amount of ORV use in the management area, but fencing of sensitive habitat, increasing patrols, more field monitoring, and posting boundaries would minimize any adverse impacts.

LACKS CREEK MANAGEMENT AREA

Impact on the Availability of Timber to the Market

Timber Production (Proposed Action)

Under the TIMBER PRODUCTION (PROPOSED ACTION) the 3,100 acres of available commercial forest land (CFL) within the management area will be managed for timber production. About 0.5 MMBF per year will be harvested. While this will not significantly benefit the local economy, it will have a long-term, positive impact on the area's timber resources and the availability of timber to the market. This alternative establishes an 800-acre old-growth Research Natural Area/Area of Critical Environmental Concern (RNA/ACEC). Approximately 100 acres of land within the available CFL will be removed from production reducing the base from 3,200 to 3,100 acres. The acquisition of 1,800 acres of high site, well-stocked CFL as well as stand improvements outlined in SYU 13, and the acquisition of timber access will have a positive effect on timber resources. As a result of these actions, the potential commercial timber to market could increase five-fold--from 32 MMBF currently available, to nearly 150 MMBF.

No Action Alternative

The NO ACTION ALTERNATIVE establishes an 800-acre old-growth RNA/ACEC within the Lacks Creek management area and allows timber management on 3,100 acres of available CFL as mentioned in the Proposed Action. Approximately, 400 acres west of Lacks Creek are proposed for disposal under this alternative. Three-quarters of this land is commercial forest land and would be removed from the available commercial forest land reducing the CFL base from 3,100 acres to 2,800 acres and eliminating 6 MMBF of standing volume (worth approximately \$600,000) and reducing the annual available allowable cut to .4 MMBF. While this will not significantly impact the local economy, it would have a minor long-term effect on the area's timber resources and the availability of timber to the market. This effect would be more than offset by the acquisition of 1,800 acres of high site, well-stocked CFL proposed under this alternative, as well as, timber stand improvements outlined

in SYU 13 and the acquisition of timber access. As a result of these actions, the potential commercial timber to market is expected to increase by 84 MMBF--from 32 MMBF to nearly 137 MMBF.

Enhancement of Natural Values Alternative

Under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, all 3,100 acres of the area's available commercial forest lands would be removed from timber production resulting in the loss to the market of 32 MMBF of standing volume valued at \$3 million. While this would not significantly impact the local economy, it would have a moderate, long-term negative impact on the area's timber resources. In addition, no timber land acquisitions are proposed nor stand improvements which would adversely effect the area's timber resources.

Administrative Adjustments Alternative

All public lands within the Lacks Creek Management Area would be disposed under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE adversely impacting the Resource Area's timber resources. However, all suitable commercial forest land would be kept in timber production pending disposal, providing timber to market. Like the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, no timber land acquisitions are proposed nor stand improvements which would adversely affect the area's timber resources.

Impact on Spotted Owls and Other Old-Growth Forest Values

Timber Production (Proposed Action)

Under the TIMBER PRODUCTION (PROPOSED ACTION) all 3,100 acres of available commercial forest land will be managed for timber production. Old-growth values on 3,100 acres will be adversely affected including a pair of spotted owls recently sighted within a portion of the available CFL base. Also, under this alternative an 800-acre old-growth reserve would be designated an RNA/ACEC providing 190 acres of old-growth habitat for a single male owl found in 1987 and possible dispersal area for the pair of spotted owls located within the available CFL base. Dispersed, recreation use and limited motorized recreational use will also be permitted but will have no adverse impact on old-growth values because of the limited amount of recreation use the area is projected to receive. As a part of the Watershed Activity Plan (which will be developed under this alternative), the Lacks Creek drainage will be rehabilitated. This will have a minor, benefitting impact on old-growth values within the drainage over time.

No Action Alternative

Under the NO ACTION ALTERNATIVE, the area's 800-acre old-growth reserve would also be designated an RNA/ACEC providing 190 acres of old-growth timber for spotted owls in the area. Spotted owls found within the available CFL base will be afforded protection as outlined in SYU-13 timber harvest guidelines (Appendix 2-1, p. 12). In addition, the rehabilitation of the Lacks Creek drainage would have a minor, benefitting impact on the owl and other old-growth values within the drainage over time.

Approximately 400 acres west of Lacks Creek are proposed for disposal but contain no outstanding old-growth and, therefore, will not affect old-growth values. The remaining 2,800 acres in the timber production base would be managed for various

forest products, with the 300 acres of CFL being disposed of and removed from the timber production base. Old-growth values on these acres will be adversely affected but overall, impacts to old-growth values in the area are considered to be minor as there is little old-growth identified in this area.

Enhancement of Natural Values Alternative

The ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would designate the entire management area as a Research Natural Area/Area of Critical Environmental Concern and remove all suitable commercial forest lands from timber production. This would moderately benefit the area's old-growth values including the one pair of spotted owls recently sighted in the area. In addition, the rehabilitation of Lacks Creek drainage proposed with this alternative would have a minor, benefitting impact on the owls and other old-growth values within the drainage over time. The exclusion of motorized vehicles in the management area as well as the proposed monitoring efforts would also benefit these values. Dispersed recreation would still be permitted, but would have no adverse impacts.

Administrative Adjustments Alternative

All public lands within the Lacks Creek Management Area would be disposed under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE. It is assumed that these lands would be acquired for timber production, adversely impacting the area's old-growth values. One pair of spotted owls recently sighted in the southern half of the Lacks Creek management area and the individual owl in the northern portion would be displaced. In addition, the Timber Production Capability Classification (TPCC) withdrawals for fragile sites and the silvicultural prescription of Management Old-Growth currently practiced and in place would be removed, further diminishing these values.

Impact on Land Tenure Adjustment

Timber Production (Proposed Action)

Under the TIMBER PRODUCTION (PROPOSED ACTION) none of the 4,500 acres of public lands within the Lacks Creek management area will be disposed. The area is on the State Land Commission's interest list, but is a lower priority than other blocks of land in the Resource Area. The impact on the State of California's indemnity selection entitlement would be minimal.

Approximately 1,800 acres of high site, well-stocked CFL will be acquired under this alternative to consolidate land for long-term timber management, thereby, improving the manageability of the area. The acquisition of nonexclusive (permanent) access to these timbered tracts surrounded by private lands will also enhance the area's manageability.

No Action Alternative

Although 400 acres of public lands within the management area would be available for disposal under the NO ACTION ALTERNATIVE, the impacts to indemnity selection, land tenure, and manageability under this alternative would be the same as those described for the TIMBER PRODUCTION ALTERNATIVE.

Enhancement of Natural Values Alternative

As in the TIMBER PRODUCTION ALTERNATIVE, none of the 4,500 acres of public lands within the Lacks Creek Management Area would be available for disposal under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE. Since these lands are a lower priority for selection by the state, impacts would be minimal. Approximately 1,800 acres of land within the Lacks Creek watershed would be acquired to enhance old-growth dependent wildlife species and riparian values which would benefit the manageability of the area for natural values.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE, all of the 4,500 acres of public land within the Lacks Creek management area would be available for disposal. The relatively high site quality and surrounding land uses, make this is a reasonable choice for long-term timber management by the California State Lands Commission (SLC). Although this is not a high priority for State Lands Commission selection, it is anticipated that this area will be managed for long-term timber management.

This alternative also allows disposal for the purpose of acquiring Federal lands and resources elsewhere. The land is appropriate for King Range acquisitions in Humboldt County, and could be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence, including acquiring high priority lands in other BLM districts (at a favorable ratio of acres required to acres disposed due to the economic value of the standing timber).

BUTTE CREEK MANAGEMENT AREA

Impact on The Availability of Timber to the Market

Enhancement of Natural Values (Proposed Action)

The ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION) will remove all 2,100 acres of commercial forest land from timber production. This impact will result in withholding 53 MMBF of commercial timber, estimated at about \$5 million current stumpage value, from the market. About 0.85 MMBF will not be harvested annually. While this will not significantly impact the local economy, it will have a moderate, long-term negative impact on the area's timber program. The geographic area is ideal for attempting long-term management for predictable levels of timber production and under this alternative the opportunity will be foregone, significantly impacting the Area's timber resources.

Timber Production Alternative

Under the TIMBER PRODUCTION ALTERNATIVE, 2,000 acres of commercial forest land (CFL) would be managed for timber. About 0.85 MMBF would be harvested annually. While this would not significantly benefit the local economy, it would have a long-term, positive impact on the area's timber resources and the availability of timber to the market. The acquisition of 900 acres of high site, well-stocked CFL, as well as timber stand improvements outlined in SYU 13 on 300 acres, and the acquisition of timber access would improve the quality of the area's resource. As a result of these

actions, the commercial timber to market is expected to increase--from 53 MMBF to 125 MMBF. Retention of the streamside buffer zones, totaling about 100 acres would remove 4 MMBF of commercial timber, but would have no significant impact on the area's timber production capability.

Natural History Alternative

Under the NATURAL HISTORY ALTERNATIVE, all suitable commercial forest land in the Butte Creek block would be removed from the timber base (roughly 1,235 acres). Streamside buffers would also be removed reducing the total production base in the management area from 2,100 acres to 825 acres. As a result, nearly 0.45 MMBF would be removed from harvest, reducing the annual available cut from 0.85 MMBF to 0.40 MMBF over the first rotation. This loss, however, would be offset by the acquisition of 900 acres of high site, well-stocked CFL near the Larabee Butte block which would add 0.38 MMBF to the annual commercial timber availability, maintaining the economic viability of the management area for timber production.

Timber stand improvements on over 300 acres such as 100 acres of precommercial thinning, 60 acres of grass control, and about 160 acres of brush and hardwood control would significantly improve timber production capability.

No Action Alternative

The NO ACTION ALTERNATIVE formally establishes a 360-acre old-growth RNA/ACEC on the Butte Creek portion of the management area and precludes timber harvest on approximately 1,200 acres because of the presence of spotted owls. As a result, about 27 MMBF of commercial timber land would be removed from market availability and the annual available cut would be reduced from 0.85 MMBF to 0.40 MMBF over the first rotation. As in the NATURAL HISTORY ALTERNATIVE, this loss would be mostly offset by the acquisition of approximately 900 acres of high site, well-stocked CFL near the Larabee Butte portion of the management area which would add 0.38 MMBF to the annual commercial timber availability. Thereby maintaining the economic viability of the management area for timber production. The net result would be a loss of .07 MMBF/year.

Timber stand improvements on over 300 acres would improve the quality of the Area's timber resources.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE, all of the 2,500 acres of public land within the Butte Creek management area would be available for disposal. These lands are Priority I on the State Lands Commission's State Indemnity Selection list and would, therefore, probably be acquired by the State, maintaining the availability of 53 MMBF of commercial timber to the market.

The alternative also allows disposal for the purpose of acquiring Federal lands and resources elsewhere. These lands could be used to consolidate federal interests in areas of high visibility and significant federal ownership, including acquiring high priority lands in other BLM districts (at a favorable ratio of acres required to acres disposed due to the economic value of the standing timber).

Impact on Spotted Owls and Other Old-Growth Forest Values

Enhancement of Natural Values (Proposed Action)

The ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION) will remove all suitable commercial forest lands from timber production and designate the entire management area as a Research Natural Area/Area of Critical Environmental Concern. As a result, habitat for the four existing pair of spotted owls will be maintained. This area may be an old-growth island or "stepping stone" useful for owl dispersal between Bureau, Forest Service and State old-growth lands. In addition, the acquisition of about 900 acres of private land in the Butte Creek watershed for the expansion of old-growth dependent species and riparian values will benefit the spotted owl and old-growth forest values. Long-term biological and botanical research will also be assured by retaining the area in its natural state and through establishing a monitoring program. Livestock grazing will not be allowed, and mineral material sales and off-highway vehicle use of 100 visitor days will be prohibited further protecting old-growth values and minimizing any disturbance to the spotted owls.

Timber Production Alternative

Under the TIMBER PRODUCTION ALTERNATIVE all 2,000 acres of available commercial forest land would be intensively managed for timber production. The four pairs of nesting spotted owls found within the management area would be displaced. These owls would probably disperse to nearby Forest Service or State Park lands. In addition, 360 acres of old-growth values in the Butte Creek portion of the management area would be lost. Off-highway vehicle use, even in limited designated areas under this alternative, would contribute to the dispersal of the spotted owl.

Natural History Alternative

Under the NATURAL HISTORY ALTERNATIVE approximately 0.40 MMBF of timber would be harvested annually from the available forest land in the Larabee Butte block resulting in the loss, or probable dispersal, of two pairs of spotted owls. Retention of the Butte Creek block for old-growth values would protect habitat for the two remaining pairs of spotted owls found in the management area and preserve 360 acres of old-growth forest values. In addition, the acquisition of 900 acres in the Butte Creek watershed would allow expansion of old-growth dependent species and riparian values, and further preserve and expand the habitat for the two pairs of spotted owls.

Long-term biological and botanical research would be assured by retaining Butte Creek in its natural state, and through establishing a monitoring program. Old-growth values would also be retained, and no disturbance to spotted owls would occur by eliminating livestock grazing, mineral material sales, and off-highway vehicle use.

No Action Alternative

The NO ACTION ALTERNATIVE formally designates the 360 acres in the candidate old-growth reserve in the Butte Creek block as a Research Natural Area/Area of Critical Environmental Concern, and removes 1,200 acres from the timber

production base. This offers protection to the four pairs of spotted owls and the existing old-growth values. However, it does not allow for establishing replacement stands of old-growth timber.

Long-term biological and botanical research would be assured by retaining the area in its natural state, and through establishing a monitoring program. Old-growth values would also be retained, and no disturbance to spotted owls would occur by eliminating livestock grazing, mineral material sales, and off-highway vehicle use.

Administrative Adjustments Alternative

The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would be detrimental to old-growth values. This alternative proposes to dispose of all Bureau lands in order to meet some of the in-lieu entitlement due to the State of California, and to improve manageability in areas of other Bureau high visibility programs. The existing 360 acres of old-growth forest would be lost as it is expected the new landowner would harvest the timber for its market value. If Bureau lands were acquired by the State Lands Commission towards settlement of the 52,000-acre entitlement remaining to the State under their statehood grant, no lands would be acquired by the Bureau. In all probability, the State would offer the standing timber for sale, resulting in displacement of the four pairs of spotted owls. This displacement would probably be to the nearby Forest Service or State Parks lands.

If some of the Bureau lands are exchanged with private timber owners, the Bureau would acquire an equal value of land elsewhere. It is assumed these acquired lands would not be suitable habitat for the spotted owls displaced from existing habitat. In this case, such land exchanges would result in displacement of the four pairs of spotted owls, probably to the nearby Forest Service or State Parks lands, and a loss of old-growth values on 360 acres.

Impact on Land Tenure Adjustment

Enhancement of Natural Values (Proposed Action), Timber Production Alternative, Natural History Alternative, and No Action Alternative

None of the public lands within the management area will be available for disposal under the ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION), the TIMBER PRODUCTION, the NATURAL HISTORY, nor the NO ACTION ALTERNATIVES. This area is one of the highest priorities on the State Lands Commission's (SLC) interest list and is considered a high potential for long-term timber management by the Commission. The impact to the state would be the loss of an opportunity to acquire high value timber land.

This is also a reasonable area to consolidate land for long-term Federal timber management as proposed in the NO ACTION and the TIMBER PRODUCTION ALTERNATIVES because of the high site quality and surrounding land uses. It is also very reasonable and appropriate to consider consolidation for purposes of enhancing spotted owl habitat and other old-growth forest characteristics. As this land is not in an area of extensive BLM preserve or administrative influence, the administrative costs and manageability problems inherent in managing small scattered blocks would be high.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, all 2,500 acres of public land within the Butte Creek management area would be available for disposal. Because of the high site quality and surrounding land uses, this is a reasonable area for long-term timber management by SLC. However, it is not an area of extensive SLC presence or administrative influence. Nevertheless, the alternative could help satisfy the State's indemnity entitlements.

The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE also allows disposal for the purpose of acquiring Federal lands elsewhere. The land is appropriate for King Range acquisitions in Humboldt County, and could be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence, including acquiring high priority lands in other BLM districts (at a favorable ratio of acres required to acres disposed due to the economic value of the standing timber), thereby improving manageability of these lands.

KING RANGE VICINITY MANAGEMENT AREA

Impact on Land Tenure Adjustment

Enhancement of Natural Values (Proposed Action)

Under the ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION), 3,740 acres within the management area will be retained and efforts will be made to consolidate resources between the Mattole River and the Pacific Ocean, both inside and outside of the King Range National Conservation Area. This will improve administrative efficiencies significantly. The State Lands Commission has not expressed any interest in these tracts so there is no impact to indemnity selection. Approximately 120 acres of public land within the boundaries of the Sinkyone Wilderness State Park will be available for disposal for park purposes, thereby benefitting the management of the park.

No Action Alternative

The impacts to State indemnity selections and manageability under the NO ACTION ALTERNATIVE would be the same as those for the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE.

RED MOUNTAIN MANAGEMENT AREA

Impact on the Availability of Timber to the Market

Enhancement of Natural Values (Proposed Action)

Under the ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION) 700 acres of suitable commercial forest land will be removed from the timber production base as a result of the implementation of resource protection measures. This will reduce the amount of timber available to the market by approximately 14 MMBF. However, the loss will neither significantly impact the local economy nor have a negative impact on the Area's timber resources. The remaining 16,000 acres of the timber production base will be harvested at an annual rate of 1.5 MMBF per year. In

addition, 3,500 acres of high site, well-stocked CFL will be acquired. This acquisition coupled with the tree plantings, precommercial thinning and brush and hardwood controls and timber easement acquisitions proposed under this alternative could increase the commercial timber to market nearly five-fold--from 91 MMBF to 450 MMBF. Currently, however, the economic viability of the Area's timber resource is considered marginal because of the low amount standing volume per acre, poor timber stand characteristics, and lack of access to several parcels.

No Action Alternative

The impacts to timber unavailability and long-term timber management under the NO ACTION ALTERNATIVE are the same as those for the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE--PROPOSED ACTION.

Administrative Adjustments Alternative

With the exception of 12,200 acres of public lands in the Red Mountain and Northern California Coast Range Preserve (NCCRP) ACEC, the Wild and Scenic River corridors, and the Charlton Creek and Bell Spring Creek watersheds, all public lands within the Red Mountain management area would be disposed under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE. About 16,000 acres of the area's 16,700 acres of available commercial forest land are on the lands slated for disposal. As these lands would likely be acquired by the State Lands Commission, and later harvested, this would not affect the availability of timber to the marketplace. It would, however, adversely affect the Resource Area's timber resources.

Impact on Spotted Owls and Other Old-Growth Forest Values

Enhancement of Natural Values (Proposed Action)

Under the ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION) 700 acres of suitable commercial forest land in the NCCRP, the Cedar Creek portion of the Red Mountain ACEC, and along the South Fork of the Eel River will be removed from timber production; the remaining 16,000 acres will be harvested. As a result, 810 acres of candidate old-growth reserve will be protected and 1900 acres (Jewett Rock and Charlton Creek/White Slide) will be lost. This will provide habitat for the one pair of spotted owls recently sighted in the Cedar Creek area. The one pair in the Charlton Creek/White Slide area will be protected according to SYU-13 mitigations as described below and in Appendix A-12. About 3,500 acres of land in the vicinity of Charlton Creek and Bell Springs Creek watersheds and the South Fork of the Eel River will also be acquired which will further benefit old-growth values. The exclusion of motorized vehicles in the more sensitive portions of the management area as well as the proposed monitoring efforts will also benefit these values. Dispersed, unstructured recreation will still be permitted but will have no significant adverse impact on the area's spotted owls nor old-growth values.

Timber production will be permitted on the remaining 22,100 acres of the management area. Although no spotted owls have been recently sighted on these lands, a 300-acre set-aside is proposed under this alternative to protect any owls that may be sighted. In addition, lands within the area will be monitored periodically for the presence of additional owls.

No Action Alternative

Under the NO ACTION ALTERNATIVE, the impacts to spotted owls and other old-growth forest values would be essentially the same as those for the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE. However, all 2,710 acres of candidate old-growth reserve--including Jewett Rock--would be preserved.

Administrative Adjustments Alternative

Although 22,100 acres would be disposed under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, considerable protection would be afforded old-growth forest values on 1,100 acres in the Cedar Creek and Charlton Creek/White Slide reserves, in the NCCRP, and within the Wild and Scenic River corridors. These lands would be retained and managed to protect and enhance the old-growth forest values on them including the three pair of spotted owls. Old-growth components on those lands slated for disposal (which could include 800 acres in Jewett Rock), however, would be lost as the Timber Production Capability Classification (TPCC) withdrawals for fragile sites and the silvicultural prescriptions for managed old-growth currently practiced and in-place would be removed. None of the lands proposed for acquisition under either of the other alternatives would be acquired further diminishing the area's old-growth values. Neither of these actions, however, would significantly affect the preservation of representative samples of old-growth forest ecosystems, or any specific value (such as spotted owl).

Impact on Land Tenure Adjustment

Enhancement of Natural Values (Proposed Action)

Under the ENHANCEMENT OF NATURAL VALUES (PROPOSED ACTION) 3,000 acres will be available for disposal and could be used to help satisfy the State's indemnity entitlements. This land is on the State Lands Commission's interest list, although it is a lower priority than the Butte Creek management area.

The remainder of the area will be retained and managed for timber production and the protection and enhancement of natural resource values. This is a reasonable area to consolidate land for long-term Federal management of these resources. There are several high site timber stands in the area, legal and physical access exists, and the area is large and has a diversity of resources and natural values. In addition, there is a significant BLM administrative presence in the vicinity and 2,800 acres of land have already been acquired. To this end, 3,500 acres of land will be acquired within the management area for timber production. About 2,600 acres will be acquired to protect peregrine falcon nesting sites, and 900 acres will be acquired to protect riparian values. These acquisitions will enhance the manageability of the area and area's natural resources.

No Action Alternative

Under the NO ACTION ALTERNATIVE, 2,000 acres would be available for disposal and could be used to help satisfy the State's indemnity entitlement. Aside from this difference, the actions proposed under this alternative are the same as those for the ENHANCEMENT OF NATURAL VALUES. The impacts to indemnity selection, land tenure, and manageability would, therefore, be the same.

Administrative Adjustments Alternative

The ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE would benefit the State in helping satisfy the State's indemnity entitlements. Under this alternative, 22,100 acres of land encompassing 16,000 acres of commercial forest land are proposed for disposal. Because of the proximity of these lands to those the State manages in the Covelo area, this is a reasonable area for long-term timber management by the State Lands Commission.

This alternative also allows disposal for the purpose of acquiring Federal lands and resources elsewhere. The land is appropriate for King Range acquisitions in Humboldt County, and could be used to consolidate Federal lands and resources in areas less remote from BLM administrative influence, including acquiring high priority lands in other BLM districts (at a favorable ratio of acres acquired to acres disposed due to the economic value of the standing timber), thereby enhancing the manageability of the Federal lands.

COVELO VICINITY MANAGEMENT AREA

Impact on the Availability of Timber to the Market

Administrative Adjustments (Proposed Action)

All public lands within the Covelo Vicinity management area will be disposed under the ADMINISTRATIVE ADJUSTMENTS (PROPOSED ACTION) adversely impacting the Resource Area's timber resources. However, all 9,400 acres of available commercial forest land will be kept in timber production pending disposal, providing about 1.4 MMBF to the market annually.

No Action Alternative

Under the NO ACTION ALTERNATIVE, public lands within the management area would be retained. An average of 1.1 MMBF would be harvested annually from the 8,500 acres of available commercial forest lands. While this will not significantly benefit the local economy, it would have a long-term, positive impact on the area's timber resources and the availability of timber to the market. Tree plantings, brush and hardwood release, precommercial thinning, and other proposed forest improvements would also benefit the area's timber resources, increasing the potential commercial timber to market from 70 MMBF to 220 MMBF.

Impact on Spotted Owls and Other Old-Growth Forest Values

Administrative Adjustments (Proposed Action)

All public lands within the management area will be disposed under the ADMINISTRATIVE ADJUSTMENTS (PROPOSED ACTION) including sensitive areas such as the Big Butte portion of the Yolla Bolly-Middle Eel Wilderness, the Eden Valley and Thatcher Ridge WSAs, Eden Creek, Little Darby, Hulls Creek, and portions of the Wild and Scenic River system. Most of these areas are contiguous or near National Forest lands (the Mendocino and Six Rivers National Forests) and could be transferred to the Forest Service under this alternative. As a result, the spotted owls and other old-growth forest values found in these areas would continue to be protected and enhanced through consolidation. The remaining 21,500 acres of

public land would be available for in-lieu selections, exchanges, etc. As there are no significant old-growth forest values on these parcels, their disposal would only minimally affect old-growth forest values.

No Action Alternative

Under the NO ACTION ALTERNATIVE, public lands within the management area would be retained and timber harvests would be conducted in the area's commercial forest lands. However, streamside buffers, Little Darby, Hulls Creek, Willis Ridge, and Eden Creek would be removed from the timber production base, thereby protecting the spotted owls and old-growth forest values found on these lands. Sensitive plant and animal species on the remainder of the management area would be considered and protected according to the BLM California Sensitive Species Policy (see Appendices 2-3 and 2-4).

Little Darby, Hulls Creek, Willis Ridge and Eden Creek would also be closed to motorized vehicles eliminating the noise and surface disturbance associated with this use and benefitting old-growth wildlife values in these areas. Dispersed, unstructured recreation would still be permitted, but would have no adverse impacts. Eden Creek would be designated an RNA/ACEC and 640 acres of private inholdings would be acquired benefitting the old-growth values found within the area.

Impact on Land Tenure Adjustment

Administrative Adjustments (Proposed Action)

All public within the management area will be disposed under the ADMINISTRATIVE ADJUSTMENTS (PROPOSED ACTION). Approximately 45,000 acres of the area are contiguous to National Forest lands (the Mendocino and Six Rivers National Forests) and will be transferred to the Forest Service. The remaining 21,500 acres will be available for state in-lieu selections or private acquisition. However, no tracts within the management area are on the State Lands Commission's interest list and it is doubtful the State will revise the list to acquire any of the tracts because of their poor economic value. If the State does not select these tracts, they will be exchanged with private landowners to acquire Federal lands elsewhere and consolidate Federal land ownership and benefit manageability.

No Action Alternative

The NO ACTION ALTERNATIVE would have little or no impact on the State's indemnity entitlements as no tracts within the area are on the State Lands Commission's interest list. While it is reasonable to consolidate land for long-term Federal management as proposed in this alternative, the efficiencies of BLM management are low when compared to possible efficiencies that could be recognized by transferring these lands to the Forest Service which has a significant administrative presence in the Covelo area.

SCATTERED TRACTS MANAGEMENT AREA

Impact on the Availability of Timber to the Market

No Action (Proposed Action)

Under the NO ACTION (PROPOSED ACTION) Gilham Butte and Iaqua Buttes would be designated Resource Natural Areas/Areas of Critical Environmental Concern. Approximately 2,500 acres of this land is suitable forest land and would be removed from the annual production base reducing the base from 6,200 acres to approximately 3,700 acres. However, of this 3,700 acres, 2,500 acres are small, scattered tracts and are uneconomical for BLM to harvest. As a result, only 1,200 acres of CFL would be available for harvest. Nearly 90 MMBF of standing volume (worth about \$9 million) would be removed from harvest--reducing annual available cut from 1.7 MMBF to .3 MMBF over the first rotation. While this would not significantly impact the local economy, it would have a significant, long-term effect on the Area's timber resources and the availability of timber to the market.

Enhancement of Natural Values Alternative

The ENHANCEMENT OF NATURAL VALUES ALTERNATIVE formally designated three areas (roughly 6,000 acres) as Resource Natural Areas (RNAs)/Areas of Critical Environmental Concern (ACEC)--Iaqua Buttes, Eagle Peak/Greenough Ridge, and The Cedars. Under this alternative, all commercial forest lands within these areas would be removed from the timber production base to protect old-growth forest characteristics and sensitive plant and animal habitat. As a result, 14 MMBF of standing timber, valued at \$1.4 million would be lost to the market. The remaining 6,700 acres of the management area would be disposed. However, these lands would probably be acquired by surrounding landowners and would continue to be managed for timber production.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, 10,500 acres of land will be disposed. These lands contain the majority of the commercial forest lands found within the management area--almost 6,200 acres with an estimated 108 MMBF of timber. To make these lands more attractive to potential selectors, the CFL will be removed from the timber production base eliminating the 108 MMBF of timber from the market over the short-term. In all probability, however, these lands will be acquired by surrounding landowners, whether private parties or timber companies, and the timber made available to the market. This will not significantly impact the local economy. Approximately 5,000 acres in the Eagle Peak/Greenough Ridge areas and The Cedars will be retained and managed by the Bureau, but will not effect the Area's timber resources or the availability of timber to the market.

Impact on Spotted Owls and Other Old-Growth Forest Values

No Action (Proposed Action)

Under the NO ACTION (PROPOSED ACTION), 8,600 acres would be retained including all areas within the Clear Lake Resource Area which are a part of Scattered Tracts Management Area. In addition to the area's designated for retention in the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, Gilham Butte would also be retained to protect the Area's old-growth forest values. Gilham Butte

and laqua Buttes (about 3,600 acres) would be designated RNAs/ACECs and all suitable commercial forest land would be withdrawn from the timber product base. As a result 1,320 acres of old-growth reserve at Gilham Butte and 390 acres at laqua Buttes would be protected. The remaining 3,600 acres of the management area's timber production base would be available for harvest.

Nearly 6,900 acres of the management area would be disposed and the timber on these lands harvested eliminating some components of old-growth forests. About 280 acres of existing old-growth reserve at Big Bend would also be lost but would not significantly impact the management area's old-growth forest values.

Enhancement of Natural Values Alternative

Like the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, both the Eagle Peak/Greenough Ridge area and The Cedars will be retained under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE to protect the sensitive plant and animal species found on these parcels. In addition to these lands, laqua Buttes would also be retained to protect the area's old-growth forest characteristics including the breeding pair of spotted owls found within the area. These areas would also be designated Research Natural Areas/Areas of Critical Environmental Concern (RNAs/ACECs) and all suitable commercial forest land would be withdrawn from the timber production base. As a result of these actions, the old-growth characteristics and the sensitive plants and animals found within these areas would be protected and enhanced over time. The acquisition of 1,000 acres of private land in and around these areas would also benefit these values, eliminating the possibility of conflicting uses and consolidating Federal ownership. These areas would also be closed to motorized vehicle use, eliminating the noise and surface disturbance associated with this use and also benefitting the area's old-growth characteristics and sensitive plants and animals.

Approximately 9,500 acres of the management area would be disposed and the timber on these lands harvested eliminating some components of old-growth forests. Existing old-growth reserves at Gilham Butte (1,320 acres) and Big Bend (280 acres) would also be lost. Neither of these stands nor any of the lands identified for disposal, however, have been found to possess significant old-growth habitat or values.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, 10,500 acres of the management area will be disposed. TPCC withdrawals and managed old-growth silvicultural prescriptions currently in place will also be removed. As a result, some components of old-growth forests will be lost as existing timber stands are harvest. Existing old-growth reserves at Gilham Butte (1,320 acres), laqua Buttes (390 acres), and Big Bend (280 acres) will also be lost and the breeding pair of spotted owls in laqua Buttes will be displaced. Neither Big Bend, nor the majority of lands identified for disposal, however, have been found to possess significant old-growth habitat or values.

Both the Eagle Peak/Greenough Ridge area and The Cedars area will be retained under this alternative. Eagle Peak and Greenough Ridge are near known peregrine falcon nesting sites; this retention will protect and serve to enhance the area's peregrine falcon population. Two BLM sensitive plant species (two subspecies of *Streptanthus morrisonii*) are limited to The Cedars and will be protected under this

alternative. Both areas will also be closed to ORV use, eliminating the noise and surface disturbance associated with this use and benefitting the sensitive plant and animal species found in these areas.

Impact on Land Tenure Adjustment

No Action (Proposed Action)

The NO ACTION (PROPOSED ACTION) would have little or no impact on the State's indemnity entitlements. About 6,900 acres would be disposed under this alternative and none of these lands are on the State Lands Commission's interest list. Approximately 800 acres of private land around Gilham Butte would be acquired for recreational uses minimally benefitting the manageability of this area.

Enhancement of Natural Values Alternative

The impacts would be the same as for the Proposed Action. Approximately 1,000 acres of private land within the Eagle Peak/Greenough Ridge area, The Cedars, and Iaqua Buttes would be acquired to consolidate Federal ownership and would benefit the manageability of these areas.

Administrative Adjustments Alternative

Under the ADMINISTRATIVE ADJUSTMENTS ALTERNATIVE, 10,500 acres of public land (6,200 acres of commercial forest land) within the management area would be available for disposal and could help satisfy the State's indemnity selections. Realistically, however, much of this land is of such poor economic value or presents such significant manageability problems as to be of no interest to the State Lands Commission. This lack of interest reflects the understanding of the management difficulties inherent in dealing with small tracts such as these and the nature of the remaining timber resources on these lands: scattered timber stands, relatively low sites, and understocked stand condition.

The long-term result of this alternative will most likely be disposal, via exchange, of the better remaining lands to surrounding landowners to enhance their management.

CUMULATIVE IMPACTS

This section summarizes and compares the cumulative impacts projected to occur as a result of implementing any of the alternatives described in Chapter 2. It focuses on the entire planning area and was developed by aggregating the impacts described in the preceding section, management area-by-management area, for each alternative and comparing these to those actions proposed by other agencies in the region.

Seven alternatives, including the PROPOSED ACTION, are analyzed. Impacts are presented by issue and are defined in terms of what is likely to happen to various resources or land uses during the life of the plan. Impacts that are not discussed here either have no significance or would not occur.

PROPOSED ACTION

Under the PROPOSED ACTION, 51,092 acres of public land within the planning area will be retained and managed for a number of uses and resources including timber management, recreation, wildlife and old-growth. Nearly 12,700 acres will be acquired to enhance or protect these resources. Over 60 percent of the planning area (76,520 acres) will be disposed to help satisfy the State of California indemnity selection entitlement and to consolidate Federal ownership. The majority of these lands will be transferred to the U.S.D.A.-Forest Service (45,000 acres).

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The PROPOSED ACTION allows controlled ORV use on the Samoa Dunes portion of the Samoa Peninsula and limited use on the Manila Dunes portion. Current motorized recreation use on the Samoa Dunes is estimated at 8,000 visitor days per year. This use will benefit from the development of the 125-acre off-road vehicle park proposed for the Samoa Dunes, increasing to about 17,000 visitor days per year. The closure of 175 acres of the Samoa Dunes to motorized vehicle use will adversely affect off-road vehicle recreation opportunities minimally. However, the loss of these opportunities will be offset by the recreational development already discussed.

At Manila Dunes, current ORV use is estimated to be 3,000 visitor days annually. By confining vehicles to approximately 47 acres of mostly unvegetated sand dunes, motorized recreation opportunities will be adversely affected because of the reduced amount of land open to ORV use. The number of riders at Manila Dunes will decrease from 3,000 visitor days per year to about 1,500 visitor days. As a result, a greater demand for increased ORV use of the Samoa Dunes will occur.

Impact on Botanical Values (Including Wetlands) and Passive Recreation -- Samoa Peninsula

The PROPOSED ACTION provides for the protection of wetlands and Menzies' wallflower and the enhancement of passive types of recreation. Under this alternative, 175 acres of land in the Samoa Dunes area will be closed to motorized vehicles. Motorized vehicles will be limited to mostly unvegetated areas in the Manila Dunes, thereby reducing the noise and surface disturbance associated with this use. This will benefit the area's botanical values and enhance nonmotorized recreation uses such as hiking, camping, sightseeing, etc. Designation of the Manila Dunes as an Outstanding Natural Area/Area of Critical Environmental Concern (ONA/ACEC) will focus greater attention on the area's natural values and serve to further enhance these values.

The ORV recreational facility planned for the Samoa Dunes will increase the amount of ORV use in the management area, but fencing of sensitive habitat, increasing patrols, more field monitoring, and posting boundaries will minimize any adverse impacts.

Impact on the Availability of Timber to the Market

Under the PROPOSED ACTION 20,800 acres of the planning area's 40,100 acres of commercial forest land (CFL) will be managed for timber production. Approximately 6,300 acres of the 19,300 acres removed from the timber production base will be withdrawn to protect or enhance natural resource values. The remainder

(13,000 acres) is on public land slated for disposal. However, 9,400 acres of the CFL to be disposed in the Covelo Vicinity will be kept in production, as well as 1,200 acres in the Scattered Tracts management area; 2,500 acres in the Scattered Tracts management area will be temporarily removed from production, but will be come available for production once the lands are disposed. As a result of these actions, 134 MMBF of timber in the Red Mountain, Butte Creek and Scattered Tracts management area will be forgone, reducing the planning area's standing volume to 253 MMBF and the annual available cut from 6.15 MMBF per year to 4.1 MMBF. Approximately 130 MMBF in the Covelo Vicinity and Scattered Tracts management areas will be made available to the market but removed from the Resource Area's long-term timber management program. While this will not significantly affect the local economy, it will have an adverse impact on the Area's timber resources.

Approximately 5,300 acres of high site, well-stocked CFL will be acquired under this alternative. The acquisition of this land, timber stand improvements outlined in SYU-13, and the acquisition of timber access will significantly benefit both the availability of timber to the market and the timber management program over the long-term (75 to 110 years), increasing the potential commercial timber to market from 253 MMBF to 600 MMBF and the annual available cut from 4.05 MMBF to 9.60 MMBF per year.

The Proposed Action would have a negative cumulative impact on the availability of timber to the market by removing 134 MMBF (2 MMBF/year annual production) from the allowable cut base. By comparing this amount to the annual timber production regionwide (see Regionwide Timber Resources p. 3-6), this will have a minor impact on the regions timber supply, less than 1% of the annual production for the region. Even with the increased long-term projection of commercial timber to the market the actual contribution to regional annual timber production is still less than 1%.

Impact on Spotted Owls and Other Old-Growth Values

The U.S. Fish and Wildlife Service (FWS) announced in the Federal Register on 6/23/89 that the northern spotted owl is now being considered for inclusion on the Federal list of endangered and threatened species. Section 7(a) (4) of the Endangered Species Act, and Bureau implementing manual section, requires that Federal agencies confer with the U.S. Fish and Wildlife Service (FWS) on any action that may affect the continued existence of a proposed species or result in destruction or adverse modification of proposed critical habitat. This means that BLM must confer with FWA on all projects (e.g. timber sales) which may impact the northern spotted owl or affect its recovery. Projects will be reviewed to determine their impact on owls, habitat for dispersing owls, preventing further isolation of subpopulations and maintaining future management options for northern spotted owls. The FWS is presently developing a definition of suitable spotted owl habitat.

Under the PROPOSED ACTION 3,680 acres of the planning area's 6,190 acres of old-growth reserve will be preserved; 2,510 acres will be lost as a result of timber harvests and land disposals. As a result, one of the eight pairs of spotted owls, and one of the area's three individual owls will be displaced. Approximately 7,100 acres will be designated RNA/ACECs and 5,600 acres will be acquired protecting the area's more significant old-growth values and enhancing these values. The exclusion/limitation of motorized vehicles in the more sensitive portions of the planning area, livestock grazing and material sales restrictions, as well as the monitoring efforts proposed under this alternative will also benefit these values.

The Proposed Action would have a positive cumulative impact by maintaining viable breeding populations, and securing suitable nesting areas, food, and other spotted owl habitat needs on public lands. Habitat for seven of eight existing pairs and two of three individual owls known to roost on Bureau lands would be managed as RNA/ACECs. Key areas in Lacks Creek, Laqua Butte, Butte Creek, and Cedar Creek would be protected, benefitting most existing spotted owls on public lands and providing important dispersal nodes which complement spotted owl habitat on adjoining National Forest and State lands in the region.

The Proposed Action would have a minor impact on existing spotted owl habitat and population in Mendocino, Humboldt, and Del Norte Counties. Most spotted owls in this region occur in the Mendocino and Six Rivers National Forests where the Forest Service estimates 200 spotted owl pairs are found. An undetermined number of owls inhabit Redwood National Park and State Forests and parks in the region. Figures are not available for the private and other lands, although most habitat on private lands has been logged.

Future management actions in the Mendocino and Six Rivers National Forests are described and analyzed in Draft Forest Management Plans prepared for both Mendocino and Six Rivers National Forests. Subject to USFS approval, these draft plans provide long-term management direction for 100 spotted owl pairs.

Existing BLM old-growth reserves contain 6,190 acres of public lands of which the Proposed Action would preserve 3,680. Acquisition of up to 5,600 acres within proposed ACEC/RNAs to be designated under the Proposed Action will provide replacement lands which will eventually attain old-growth status and offset 2,510 acres of old-growth lost through intensive timber management or disposal under the Proposed Action.

While the majority of low-elevation Douglas-fir old-growth in the region occurs on public lands, 2,510 acres of old-growth being proposed for intensive timber management or disposal represents a small amount in comparison to the estimated total of 560,000 acres of old-growth in the region (less than one-half of one percent). The majority of this total acreage is in the Mendocino and Six Rivers National Forests. Based on Draft Forest Management Plans for Mendocino and Six Rivers National Forests, approximately 150,000 acres of old-growth would be subject to timber harvest over the next fifty years. Old-growth in Redwood National Park and State Parks in the region would continue to be protected. Most remaining old-growth on private timber lands will probably be harvested.

Impact on Land Tenure Adjustment

Over 60 percent of the planning area (76,520 acres) will be disposed under the PROPOSED ACTION to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. The majority of these lands (45,000 acres in the Covelo Vicinity management area) will be transferred to the U.S.D.A.-Forest Service. Although the other 31,520 acres will be available for indemnity selection, only 3,000 acres in the Red Mountain management area are on the State Lands Commission's interest list. Because of the poor economic value of the remaining 28,520 acres, and significant manageability problem they present, it is doubtful the

State will revise the list to acquire these tracts. Instead, these lands will probably be exchanged with private landowners to acquire Federal lands elsewhere and consolidate Federal land ownership and benefit manageability. As a result of these exchanges, the transfer of 45,000 acres of land to the Forest Service and the acquisition of 12,700 acres, the manageability of the area's resources will be significantly enhanced.

Adverse Impacts Which Cannot Be Avoided

Surface disturbance and human encroachment is inevitable with the disposal of public lands under this alternative and timber production on the remaining 20,800 acres of the planning area's commercial forest lands. Surface disturbance result in wildlife forage and cover losses which reduced habitat carrying capacity. Human encroachment will displace wildlife to adjacent nonimpacted areas. The severity of impacts depends on the quantity and type of development and the success of mitigation efforts such as those outlined in SYU-13. Under the PROPOSED ACTION the actions outlined in Chapter 2 will adversely impact 2,510 acres of the area's old-growth reserves and the old-growth values found within these reserves. These values include two of the area's eight pairs of spotted owls, and one of the area's three individual owls.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

Under the PROPOSED ACTION, current timber management practices on 19,300 acres of the Area's commercial forest lands will be precluded, affecting 264 MMBF of standing volume. Approximately 6,300 acres of this total will be withdrawn to protect or enhance natural resource values eliminating 134 MMBF over the long-term. The remaining 130 MMBF (in the Covelo Vicinity and Scattered Tracts management areas) will be made available to the market once these lands are disposed, but will be removed from the Resource Area's long-term timber management program. Approximately 5,300 acres of high site, well-stocked CFL will be acquired under this alternative. The acquisition of this land, timber stand improvements outlined in SYU-13, and the acquisition of timber access will significantly benefit both the availability of timber to the market and the timber resource over the long-term increasing the potential commercial timber to market from 253 MMBF to 600 MMBF and the annual allowable cut from 4.05 MMBF to 9.60 MMBF per year.

Irreversible and Irretrievable Commitment of Resources

Irreversible and irretrievable commitments of resources occur when a wide range of future actions are foreclosed. Under the PROPOSED ACTION, 2,510 acres of the area's old-growth reserves will be irretrievably lost as will the old-growth values found within these reserves. These losses will not be irreversible, however, due in part to reclamation efforts throughout the remainder of the planning area and the acquisition of nearly 6,000 acres of land to protect and enhance old-growth forest and wildlife values. The trees harvested under this alternative will also be an irretrievable commitment of resources, but it will not be irreversible. About 4.05 MMBF of timber will be cut and utilized per year. Commercial forest land acquisition, timber stand improvements, and the acquisition of timber access will increase the annual allowable cut from 4.05 MMBF per year to nearly 9.60 MMBF over the long-term.

NO ACTION ALTERNATIVE

Under the NO ACTION ALTERNATIVE, 10,400 acres of public land within the planning area would be disposed. Approximately 12,340 acres would be acquired; 11,140 of these acres would be acquired to enhance the area's timber and wildlife resources. The remainder of the area would be retained and managed for a number of uses and resources including timber management, recreation, and wildlife.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The NO ACTION ALTERNATIVE allows controlled ORV use on the Samoa Dunes portion and limited use on Manila Dunes. Current motorized recreation use on Samoa Dunes is estimated at 8,000 visitor days per year. This use would benefit from the development of the 125-acre off-road vehicle park proposed for Samoa Dunes increasing it to about 17,000 visitor days per year. The closure of 175 acres of the Samoa Dunes to motorized vehicle use would adversely affect off-road vehicle recreation opportunities. The loss of these opportunities, however, would be offset by the recreational developments already discussed.

At Manila Dunes, current ORV use is estimated to be 3,000 visitor days annually. By confining vehicles to only 47 acres of mostly unvegetated dune areas, motorized recreation opportunities would be adversely affected because of the reduced amount of land open to ORV use. The number of riders at Manila Dunes would decrease from 3,000 to about 1,500 visitors per year. As a result, a greater demand for and increased ORV use of the Samoa Dunes would occur.

Impact on Botanical Values (Including Wetlands) and Passive Recreation -- Samoa Peninsula

The NO ACTION ALTERNATIVE provides for the protection of wetlands and Menzies' wallflower and the enhancement of passive types of recreation. Under this alternative, 175 acres of land in the Samoa Dunes area would be closed to motorized vehicles. Motorized vehicles would be limited to 47 acres of mostly unvegetated areas in the Manila Dunes, thereby reducing the noise and surface disturbance associated with this use. This would benefit the area's botanical values and enhance nonmotorized recreation uses such as hiking, camping, sightseeing, etc. Designation of the Manila Dunes as an Outstanding Natural Area/Area of Critical Environmental Concern (ONA/ACEC) would focus greater attention on the area's natural values and serve to further enhance these values.

The ORV recreational facility planned for the Samoa Dunes would increase the amount of ORV use in the management area, but fencing of sensitive habitat, increasing patrols, more field monitoring and posting boundaries would minimize any adverse impacts.

Impact on the Availability of Timber to the Market

Under the NO ACTION ALTERNATIVE, 31,000 acres of the planning area's 40,100 acres of CFL would be managed for timber production. The 5,500 acres of CFL removed from the timber production base to protect and enhance natural values would reduce the amount of timber available to the market from 387 MMBF to 260 MMBF and the annual available cut from 6.15 MMBF per year to 4.16 MMBF. Four hundred acres (300 CFL) in the Lacks Creek management area containing 6 MMBF

would be disposed under this alternative, but would remain available for timber production. There would be no noticeable effect to the local economy as a result of these actions, nor would the area's timber management process be significantly impacted.

Approximately 6,200 acres of high site, well-stocked CFL would be acquired under this alternative. The acquisition of this land, timber stand improvements outlined in SYU-13, and the acquisition of timber access would significantly benefit both the availability of timber to the market and the timber management program over the long-term (75 to 110 years), increasing the potential commercial timber to market from 260 MMBF to almost 870 MMBF and the annual available cut from 4.16 MMBF to 13.92 MMBF per year.

The No Action Alternative would have a negative cumulative impact on the availability of timber to the market by removing 127 MMBF from the allowable cut base. Based on the annual timber production regionwide this will have a minor impact on the region's timber supply. The long-term commercial timber production would increase to about 14 MMBF per year which would amount to just over 1% of the region's annual production.

Impact on Spotted Owls and Other Old-Growth Values

Under the NO ACTION ALTERNATIVE, 5,910 acres of the planning area's 6,190 acres of old-growth reserve would be preserved; 280 acres would be lost as a result of land disposals in the Scattered Tracts management area. None of the planning area's population of spotted owls would be displaced.

Approximately 9,650 acres throughout the planning area would be designated RNA/ACECs and nearly 5,340 acres would be acquired protecting and enhancing the Area's old-growth forest values. The exclusion/limitation of motorized vehicles in the more sensitive portion of the planning area, livestock grazing and material sales restrictions, and the monitoring efforts proposed under this alternative would serve to further protect and enhance these values.

The No Action Alternative would have a positive cumulative impact by maintaining all eight pair and three individual owls known to inhabit Bureau lands. Protecting habitat for spotted owls and other old-growth values through a network of eight key old-growth reserve areas and spotted owl management areas will also provide dispersal nodes to complement spotted owl habitat on adjoining national forest and state lands in the region. Overall the No Action Alternative would have a minor regional impact on existing spotted owl habitat or population.

Old-growth reserve acreage to be preserved under this alternative is 5,910 acres. Only 280 acres are being identified for intensive timber management or disposal. This represents a very small amount of old-growth being lost in comparison to the estimated total old-growth in this region. The acquisition of 5,000 acres to protect and enhance the Area's old-growth forest values will provide replacement lands to more than offset the loss of 280 acres of old-growth habitat.

Impact on Land Tenure Adjustment

About eight percent of the planning area (10,400 acres) would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership under the NO ACTION ALTERNATIVE. Of this amount, only 3,000 acres is on the State Lands Commission's interest list. The remainder is of such poor

economic value that it is doubtful the State would acquire these lands. Instead, these lands would probably be exchanged with private landowners to acquire Federal land elsewhere. These land tenure adjustments, coupled with the acquisition of 12,430 acres for timber management, wildlife and riparian values would moderately enhance the manageability of the area's resources.

ENHANCEMENT OF NATURAL VALUES ALTERNATIVE

Under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, 12,620 acres of public land within the planning area would be disposed. Roughly 20 percent of the current commercial forest lands would be removed from the timber production base to protect and enhance the area's old-growth forest values. These values would be further enhanced with the acquisition of 12,900 acres. The remainder of the planning area would be managed for multiple-use, including timber, recreation and wildlife management.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

Impacts to ORV recreation use levels on the Samoa Dunes portion of the management area under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would be essentially the same as those for the NO ACTION ALTERNATIVE--use would increase from 8,000 visitor days to nearly 17,000 visitor days as a result of developing the off-road vehicle park and greater demand to use this area due to the closure of motor vehicles use on private lands. On the Manila Dunes portion, however, ORV use would be prohibited over the entire area eliminating ORV recreation use opportunities altogether and the 3,000 visitor days of motorized recreational use currently estimated to occur.

Impact on Botanical Values (Including Wetlands) and Passive Recreation -- Samoa Peninsula

The ENHANCEMENT OF NATURAL VALUES ALTERNATIVE would prohibit ORV use on the Manila Dunes portion of the management area, moderately benefitting the area's botanical values and passive recreation opportunities. The impact on these values and opportunities on the Samoa Dunes portion under this alternative would be the same as those for the NO ACTION ALTERNATIVE. The ORV park planned for the area would be developed and ORV use would double from 8,000 visitor days per year to 17,000 visitor days. However, any adverse impacts that might result from increased vehicular use would be minimized by fencing the 175 acres of sensitive plant habitat, increasing patrols, monitoring, and interpretive educational activities, and posting the boundaries of the project area.

Impact on the Availability of Timber to the Market

Under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, 26,160 acres of the planning area's 40,100 acres of commercial forest land would be managed for timber production. Approximately 7,400 acres of CFL would be removed from the timber production base to protect and enhance the area's natural values. As a result, the amount of timber available to the market would be reduced 132 MMBF-- from 387 MMBF to 255 MMBF--and the annual available cut from 6.15 MMBF per year to 4.08 MMBF. There would be no noticeable effect on the local economy as a result of these actions, nor would the area's timber resources be significantly impacted.

Approximately 4,500 acres of high site, well-stocked CFL would be acquired under this alternative. The acquisition of this land, timber stand improvements outlined in SYU-13, and the acquisition of timber access would significantly benefit both the availability of timber to the market and the timber management program over the long-term (75 to 110 years), increasing the potential commercial timber to market from 255 MMBF to over 670 MMBF and the annual allowable cut from 4.08 MMBF per year to 10.72 MMBF.

See regional cumulative impact analysis for Proposed Action.

Impact on Spotted Owls and Other Old-Growth Values

Under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE, 2,690 acres of the area's old-growth reserve would be preserved; 3,500 acres in the Scattered Tracts and Red Mountain management areas would be lost as a result of land disposals and timber harvest. However, the eight pairs of spotted owls and three individual owls found throughout the areas would be protected under this alternative.

Approximately 17,900 acres would be designated RNA/ACECs and 9,040 acres would be acquired protecting and moderately enhancing the area's old-growth forest values. As in the previously described alternatives, the exclusion/limitation of motorized vehicles in the more sensitive portions of the planning area, livestock grazing and material sales restrictions, and the monitoring efforts proposed under this alternative would serve to further protect and enhance these values.

See regional impact analysis under the No Action Alternative concerning spotted owls.

While the majority of low elevation Douglas-fir old-growth in the region occurs on public lands, 3,500 acres of old-growth habitat identified by this alternative for intensive timber management or disposal represent a small amount in comparison to the estimated total old-growth in this region. The USFS manages approximately 400,000 acres of old-growth. Over the next five decades about 150,000 old-growth acres will be subject to timber harvest. The 2,690 acres of old-growth habitat the BLM will preserve under this alternative as well as the 3,500 acres to be managed for timber represent a small amount compared to regionwide old-growth acres to be reserved or managed for timber production.

The acquisition of up to 9,040 acres of land within or adjacent to RNA/ACECs designated under this alternative will tend to offset the loss of 3,500 acres of old-growth habitat. A good portion of these acquired lands will provide replacement areas that will eventually attain old-growth status.

Impact on Land Tenure Adjustment

Roughly ten percent of the planning area (12,620 acres) would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership under the ENHANCEMENT OF NATURAL VALUES ALTERNATIVE. Of this amount, only one-third is on the State Lands Commission's interest list. The remainder, located primarily in the Scattered Tracts management area is of such poor economic value that it is doubtful the State would acquire these lands. Instead these lands would probably be exchanged with private landowners to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 12,900 acres would moderately enhance the manageability of the area's resources.

ENHANCEMENT OF RECREATIONAL VALUES ALTERNATIVE

With the exception of impacts to the off-road vehicle recreation use levels, botanical values, and passive recreation, the impacts under the ENHANCEMENT OF RECREATIONAL VALUES ALTERNATIVE would be the same as those described under the NO ACTION ALTERNATIVE--10,400 acres of public land would be disposed, 12,340 acres would be acquired benefitting timber and wildlife resources, and the remainder of the area would be managed for multiple-use.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The RECREATION ENHANCEMENT ALTERNATIVE is designed to actively promote ORV use on the two parcels of public land. Under this alternative, an off-road vehicle park would be developed on Samoa Dunes. As a result, ORV recreation use would increase the amount of ORV use on the Samoa Dunes from the 8,000 visitor days currently estimated to occur to nearly 17,000 visitor days and from 3,000 visitor days to nearly 5,000 visitor days on the Manila Dunes. Unauthorized vehicle use outside the management area is also likely to increase but would be restricted by posting boundaries and increasing patrols in the area. Unlike the NO ACTION ALTERNATIVE, the Manila Dunes would be opened totally to motorized vehicle use which would also benefit ORV recreational use.

Impact on Botanical Values (Including Wetlands) and Passive Recreation

Under the RECREATION ENHANCEMENT ALTERNATIVE, the Manila Dunes would be open to motorized vehicle use. As a result, the area's wetlands and Menzies' wallflower populations would be significantly impacted as would passive recreational opportunities. Increased patrols and more field monitoring of these resources would help diminish these impacts, but only minimally. Impacts to botanical values and passive recreation opportunities on the Samoa Dunes would be the same as those described in the NO ACTION and ENHANCEMENT OF NATURAL VALUES ALTERNATIVES.

Impact on the Availability of Timber in the Market

The impacts to the local economy and the planning area's timber resources would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on Spotted Owls and Other Old-Growth Values

The impact to the spotted owls and other old-growth values would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on Land Tenure Adjustment

The impacts would be the same as those described under the NO ACTION ALTERNATIVE.

TIMBER PRODUCTION ALTERNATIVE

Under the TIMBER PRODUCTION ALTERNATIVE, 10,000 acres of public land within the planning area would be disposed. Of this amount, 4,200 acres or three percent of the planning area, are commercial forest land and would be removed from

the timber production base reducing timber production over the short-term (10 to 15 years). The remainder would be managed for multiple-use diminishing the amount of old-growth reserve and old-growth values on these lands.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The impact on off-road vehicle recreation use levels would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on Botanical Values (Including Wetlands) and Passive Recreation

The impacts on botanical values, including wetlands, and passive recreation would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on the Availability of Timber to the Market

Under the TIMBER PRODUCTION ALTERNATIVE, 32,500 acres of the planning area's 40,100 acres of commercial forest land would be managed for timber production. Approximately 4,200 acres of CFL would be removed from the timber production base to protect and enhance the area's old-growth values. As a result, the amount of timber available to the market would be reduced 47 MMBF--from 387 MMBF to 340 MMBF--and the annual available cut from 6.15 MMBF per year to 5.44 MMBF. There would be no noticeable effect on the local economy as a result of these actions, nor would the area's timber resources be significantly impacted.

Approximately 6,200 acres of high site, well-stocked CFL would be acquired under this alternative. The acquisition of this land, timber stand improvements outlined in SYU-13 and the acquisition of timber access would significantly benefit both the availability of timber to the market and the timber management program over the long-term (75 to 110 years), increasing the commercial timber to market from 340 MMBF to 945 MMBF and the annual allowable cut from 5.44 MMBF per year to over 15.12 MMBF per year.

The Timber Production Alternative would have a small negative impact on regional availability of timber by reducing the volume by only 47 MMBF. The long-term commercial timber production, however, would increase with the acquisition of over 6,200 acres of high site CFL. The annual timber production would be over 15 MMBF/year or just over 1.3% of the regions annual production.

Impact on Spotted Owls and Other Old-Growth Values

Under the TIMBER PRODUCTION ALTERNATIVE, 5,550 acres of the area's old-growth reserve would be preserved; 640 acres of old-growth reserve in the Butte Creek and Scattered Tracts management areas would be lost as a result of land disposal and timber management practices. As a result, five of the eight pairs of spotted owls found within the planning area would be displaced. The remaining owls found on public lands would be protected.

Approximately 9,300 acres would be designated RNA/ACECs and 5,340 acres would be acquired, protecting old-growth forest values and enhancing these values. The exclusion/limitation of motorized vehicles in the more sensitive portions of the planning area, livestock grazing and material sales restrictions, as well as monitoring efforts proposed under this alternative would also benefit these values.

The Timber Production Alternative would have a negative cumulative impact by displacing five pair of spotted owls mainly within the Butte Creek management area. Seven old-growth reserve areas would still be designated providing habitat or dispersal nodes to complement spotted owl habitat on adjoining national forest and state lands. Overall the Timber Production Alternative would have a minor regional impact on existing spotted owl habitat or population.

While the majority of the low elevation Douglas-fir old-growth in the region occurs on public lands, 640 acres of old-growth habitat identified by this alternative for intensive timber management or land disposal represents a very small amount in comparison to the estimated total old-growth in the region.

The acquisition of about 5,300 acres of land within or adjacent to RNA/ACECs designated under this alternative will tend to more than offset the loss of 640 acres of old-growth habitat. A good portion of these acquired lands will provide replacement areas that will eventually attain old-growth status.

Impact on Land Tenure Adjustment

Only ten percent of the planning area (10,000 acres) would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership under the TIMBER PRODUCTION ALTERNATIVE. Of this amount only half is on the State Lands Commission's interest list. The remainder is of such poor economic value that it is doubtful the State would acquire these lands. Instead, these lands would probably be exchanged with private landowners to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 12,340 acres would moderately enhance the manageability of the Area's resources.

ADMINISTRATIVE ADJUSTMENT ALTERNATIVE

Under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE, 85 percent of the planning area would be available for disposal to help satisfy the State of California's indemnity selection entitlement and to consolidate Federal ownership. The remaining 20,130 acres would be retained and managed to protect and enhance wildlife and riparian values.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The impacts on off-road vehicle recreation use levels would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on Botanical Values (Including Wetlands) and Passive Recreation

Impact on botanical values, including wetlands, and passive recreation would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on the Availability of Timber to the Market

Under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVES, 36,800 acres of the 40,100 acres of commercial forest land would be disposed; however, the majority of these lands (30,600 acres) would be kept in the timber production base, pending disposal. Approximately 6,200 acres of CFL in the Scattered Tracts management

area would be temporarily removed from the timber production base but would be made available to the market once the lands are disposed. As a result, 373 MMBF will be made available to the market. About 1,600 acres of CFL would be removed from the timber production base as a result of resource protection measures, eliminating 14 MMBF of timber to the market. While these actions would have a moderate short-term benefit to the local economy, the Resource Area's timber resources would no longer be publicly managed.

The Administrative Adjustment Alternative would make available to the market 373 MMBF of timber or an annual production of about 5.97 MMBF/year. This represents less than 1% of the region's annual production and would have a small positive effect by making all public timber available to the market.

Impact on Spotted Owls and Other Old-Growth Values

Under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE, 5,380 acres of the planning area's 6,190 acres of old-growth reserve would be eliminated displacing seven pairs of spotted owls and three individual owls. Approximately 810 acres of old-growth reserve in the Red Mountain management area would be preserved protecting the old-growth values on these lands including one pair of spotted owls.

The Administrative Adjustment Alternative would have a negative cumulative impact by displacing seven pairs of spotted owls and three individual owls and eliminating 5,380 acres of old-growth reserve habitat. By not providing habitat for spotted owls and other old-growth values through an old-growth reserve network and spotted owl management areas, no dispersal nodes or gene pool source will be available to complement spotted owl habitat on adjoining national forest and state park land. Overall this alternative would have a minor regional impact on existing spotted owl/old-growth habitat or spotted owl populations.

Impact on Land Tenure Adjustment

Nearly 85 percent of the planning area (107,482 acres) would be disposed under the ADMINISTRATIVE ADJUSTMENT ALTERNATIVE to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership. A large portion of these lands (45,000 acres in the Covelo Vicinity management area) would be transferred to the U.S.D.A.-Forest Service. The remaining 62,482 acres would be available for indemnity selection. Approximately 29,000 of these acres are in the State Lands Commission's interest list and would help satisfy the State's entitlement. The rest are of such poor economic value that it is doubtful the State would acquire these lands. Instead these lands would probably be exchanged with private landowners to acquire Federal lands elsewhere. These land tenure adjustments coupled with the acquisition of 1,200 acres in the King Range Vicinity significantly benefit the manageability of the Scattered Tracts of land throughout the area.

NATURAL HISTORY ALTERNATIVE

Under the NATURAL HISTORY ALTERNATIVE, 10,000 acres of public land within the planning area would be disposed. Approximately 12,600 acres would be acquired to enhance the area's timber and wildlife resources. The remainder of the area would be retained and managed for a number of uses and resources including timber management, recreational use, and wildlife habitat management.

Impact on Off-Road Vehicle (ORV) Recreation Use Levels -- Samoa Peninsula

The impact on off-road vehicle recreation use levels would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on Botanical Values (Including Wetlands) and Passive Recreation

Impact on botanical values, including wetlands, and passive recreation would be the same as those described under the NO ACTION ALTERNATIVE.

Impact on the Availability of Timber to the Market

Under the NATURAL HISTORY ALTERNATIVE, 31,000 acres of the planning area's 40,100 acres of CFL would be managed for timber production. The 5,500 acres of CFL removed from the timber production base to protect and enhance old-growth values would reduce the amount of timber available to the market from 387 MMBF to 261 MMBF and the annual available cut from 6.15 MMBF per year to 4.18 MMBF per year. There would be no noticeable effect to the local economy as a result of these actions, nor would the area's timber resources be significantly impacted.

Approximately 6,200 acres of high site, well-stocked CFL would be acquired under this alternative. The acquisition of this land coupled with timber stand improvements outlined in SYU-13 and the acquisition of timber access would significantly benefit both the availability of timber to the market and the timber management program over the long-term (75 to 110 years), increasing the potential commercial timber to market from 261 MMBF to almost 870 MMBF and the annual available cut from 4.18 MMBF per year to 13.92 MMBF per year.

The regional cumulative impacts would be the same as the No Action Alternative.

Impact on Spotted Owls and Other Old-Growth Values

Under the NATURAL HISTORY ALTERNATIVE, 5,910 acres of the planning area's old-growth reserve would be preserved; 280 acres would be lost as a result of land disposals in the Scattered Tracts management area. To this end, two of the eight spotted owl pairs found within the planning area would be displaced. The remaining population of spotted owls on public land would be protected. These owls and other old-growth forest values would be enhanced with the designation of 10,542 acres as RNA/ACECs and the acquisition of 6,240 acres for old-growth, wildlife and riparian values. The exclusion/limitation of motorized vehicles in the more sensitive portions of the planning area, livestock grazing and material sales restrictions, and the monitoring efforts proposed under this alternative would serve to further enhance these values.

The Natural History Alternative would have a moderate negative cumulative impact by displacing two pairs of spotted owls. Five old-growth reserve areas would still be designated providing important habitat or dispersal nodes to complement spotted owl habitat on adjoining national forest and state lands. Overall the Natural History Alternative would have a minor regional impact on existing spotted owl habitat or population.

A majority of the old-growth reserve areas will be preserved with only 280 acres being lost to land disposal. This represents a very small amount in comparison to the estimated total old-growth habitat in the region and will be more than offset by the acquisition of 6,240 acres for old-growth, wildlife and riparian values.

Impact on Land Tenure Adjustment

Approximately eight percent of the planning area (10,000 acres) would be available to help satisfy the State's indemnity selection entitlement and to consolidate Federal land ownership under the NATURAL HISTORY ALTERNATIVE. Of this amount, only 3,000 acres is on the State Lands Commission's interest list. The remainder is of such poor economic value that it is doubtful the State would acquire these lands. Instead, these lands would probably be exchanged with private landowners to acquire Federal lands elsewhere. These land tenure adjustments, coupled with the acquisition of 12,600 acres would moderately enhance the manageability of the area's resources.

CHAPTER 5

CONSULTATION & COORDINATION

CHAPTER 5

CONSULTATION AND COORDINATION

OVERVIEW OF THE PROCESS

A resource management plan is comprehensive, that is, the plan itself discusses to a practical extent all relevant activities and resources within the study area. However, only for identified critical issues are alternatives developed for thorough analysis in the environmental impact statement.

The Council on Environmental Quality regulations (40 CFR 1501.7) and BLM's planning regulations (43 CFR 1610.4-1) require an early and open process (scoping) for determining these significant issues.

A Notice of Intent to prepare this plan was published in the Federal Register on January 29, 1986 (51 FR 3663) and a Notice of Availability of draft planning criteria was published on March 27, 1986 (51 FR 10578).

On March 21, 1986, about 200 scoping letters were sent to publics with an interest in Bureau planning, and over 1,000 planning update flyers were sent to the entire district mailing list. In addition, BLM resource specialists contacted other agencies and individuals for information and expression of concerns. A meeting was held January 15, 1986, with representatives of the State Lands Commission; on April 28, 1986, a meeting was held in Arcata with eight local landowners and members of environmental groups.

Fifty-eight written responses were reviewed during the scoping process. About 20 letters from surrounding landowners depicted the natural values of Gilham Butte, and requested that the area be left along; 16 letters raised concerns about spotted owls and/or old-growth, although several specified redwood; the California Native Plant Society and a few others were primarily concerned with protecting the Menzies' wallflower on Samoa Peninsula; the Cahto Coalition reiterated its request for wilderness designation for the Elkhorn Ridge, Brush Mountain, and Cahto Peak areas; timber companies and The Western Timber Association were concerned that the plight of the spotted owl was greatly exaggerated and unduly restricted timber management activities. One letter expressed concern that the BLM couldn't properly maintain its existing road network and warned against compounding the problem with further easement acquisition and road construction (this is in the "manageability" facet of the land tenure and adjustment issue). The State Lands Commission reiterated its interest in acquiring more timber land but was currently not making formal application.

Upon distribution of the Draft EIS, public workshops and hearings were held and written comments accepted. Public workshops were held on March 15, 16, & 17, 1988 at three different locations. Due to intense public interest, centering around old-growth values and ORV use on the Samoa Peninsula, public hearings were held on May 16 and 17, 1988 in two different locations. Written comments on the Draft RMP were accepted until July 18, 1988. See analysis of public comment for details of input received.

PUBLIC COMMENTS ON DRAFT EIS

A total of 1,180 oral and written comments on the Arcata Resource Management Plan were submitted by individuals, groups and agencies during the public review period. Of these, 1,079 were written documents with 3,881 signatures and 101 people provided public testimony at the hearings. Within the final EIS 22 letters are reproduced and comments are specifically noted and responded to in the following pages. Letters not reproduced are either represented by similar letters which have been reproduced or did not provide detailed comments regarding BLM response. While most letters simply stating an opinion one way or another are not included in this final, a few sample opinion letters have been included as examples and will be referred to in the following discussion.

PROCESS SUMMARY

The public comment period for the Draft Arcata Resource Management Plan (RMP) ran from January 1988 to the end of August 1988. Public meetings were held on March 15, 16, and 17 in Eureka, Garberville, and Ukiah respectively. These meetings were held to encourage interaction between the public and the Resource Area staff. Many people felt, however, the meeting format was inappropriate and requested formal public hearings. Because of this desire, hearings were held on May 16 and 17 in Garberville and Eureka.

During the public comment period 1,079 written documents were received. Each document was coded so that during our analysis comments could be tracked back to the person or group that submitted the comment. A card was sent to each commentator thanking them for their input and letting them know that we would use their input in making our final RMP decision.

GENERAL OPINION SUMMARY

The comments we received in both the public meetings and hearings can be summarized as follows:

GARBERVILLE

All of those speaking spoke in favor of preserving the area's natural resources. More specifically, they were concerned with the preservation of old-growth forests and old-growth dependent species. Speakers also expressed concern about the fate of any lands that would be exchanged to private individuals or timber companies, about soils and fragile watersheds, and about the use of herbicides.

EUREKA

The majority of those speaking at this hearing were primarily concerned with the use of off-road vehicles operating on the Samoa Peninsula. Many were opposed to ORV use; however, there was a good contingent of ORV supporters present. Other issues raised included the preservation of old-growth and old-growth dependent species, providing opportunities for equestrian use, and a general concern for environmental issues.

WRITTEN COMMENTS

The written comments received can be summarized as follows:

Conservation/Preservation

A total of 593 people wrote in commenting primarily on preservation or conservation of the area's resources. Most of these people commented on more than one issue.

- Samoa
 - The majority of comments received were form letter in nature (see comment number ARA-230 and ARA-456). They were opposed to any off-road vehicle use on the Samoa Peninsula because of the impact they have on sensitive plants and their habitat. A few people also mentioned noise and safety concerns with ORVs.
- Scattered Tracts
 - These comments were primarily in the form of hand written letters. Almost all dealt with Gilham Butte. They wanted the Bureau to protect our old-growth values and spotted owls. Several mentioned protecting the areas sensitive watershed and erosion problems (see comment letter number ARA-327 and ARA-326).
- Red Mountain
 - These comments were primarily in the form of hand written letters (see comment letter number ARA-407 and ARA-482). The concerns for this area were varied; however, the majority were those requesting the Bureau recommend the Red Mountain/Cahto Peak area for wilderness consideration and the preservation of old-growth and watershed values in the Tom Long Drainage. Many of those commenting on the Tom Long area were interested in cooperative management for the area.
- General Comments
 - The majority of these comments were hand written and dealt with the preservation of old-growth or of the old-growth reserve system.
 - Comment letters number 458 and 609 provide a representative sample of the feelings expressed in these letters.

Consumptive Use

A total of four petitions containing 2,699 signatures and 459 letters were received that emphasized the consumptive use of our resources.

- | | |
|-----------------|---|
| Samoa | - The majority of those commenting on Samoa did so in the form of petitions (see comment number ARA-302 and ARA-490). These people favored keeping both the Samoa and Manila areas open for ORV use. These users feel they can and should coexist with other users. |
| All Other Areas | <ul style="list-style-type: none">- The majority of these letters were form letter in nature. The Bureau should take whatever steps are necessary to keep timber land in production. This area cannot afford to lose any more timber producing land.- Comment letters number 516 and 635 provide a representative sample of these letters. |

Opposing Administrative Adjustments - 68 responses

These comments dealt primarily with the Tom Long Watershed, Gilham Butte, Covelo and Red Mountain areas. These commentators did not want the Bureau to dispose of any public lands. Old-growth and old-growth reserve areas were consistently mentioned.

Comment letters number 393 and 339 provide a representative sample of these letters.

Favoring Administrative Adjustments - 16 responses

The majority of these commentators said the Bureau needed to consolidate larger blocks of public land. They felt small scattered tracts were not accessible to the public but that large consolidated parcels benefitted everyone.

Comment letters number 412 and 435 provide a representative sample of these letters.

Other Comments

Many of these comments applied to the entire planning area. Most of these people favored the NO ACTION Alternative. They wanted to keep the status quo. Others proposed definite changes in the alternatives used. This ranged from selecting different alternatives to coming up with totally new alternatives.

Sample letters number 116, 119, 414 provide a representative sample of these comments.

Overall the greatest resource concerns were:

1. Off-road vehicle use.
2. Forest management, old-growth and the old-growth reserve system.
3. Spotted owl management habitat.
4. Land tenure adjustment (exchanges).
5. Sensitive habitat and botanical areas.
6. Watershed and soil erosion.

RESPONSE TO COMMENTS

Each letter reproduced in the final has been assigned an index number and individual comments within the letter were also numbered. Responses follow the complete comment letter and are individually numbered using the letter number and comment number. Any appendix material enclosed with a comment is not included herein but may be obtained from the Arcata Area Office.

DISTRIBUTION OF THE DRAFT EIS

Copies of the EIS have been furnished to numerous public libraries throughout the planning area for public review and reference. Copies have also been widely distributed to those expressing an interest in the planning process. In addition to individuals and others receiving a copy of the Draft EIS as a result of mailing lists or separate requests, the following agencies and organizations have been requested to review the document.

FEDERAL AGENCIES

Custom Service, Eureka

Department of Agriculture

Forest Service, San Francisco

Forest Service, Mendocino National Forest, Willows, Covelo, Upper Lake

Forest Service, Six Rivers National Forest, Eureka

Pacific Southwest Forest & Range Experiment Station, Berkeley

Department of Army

Corps of Engineers, Sacramento, San Francisco

Department of Interior

Bureau of Indian Affairs, Hoopa, Sacramento

Bureau of Mines, Spokane, Washington

Fish and Wildlife Service, Sacramento

Geological Survey, Menlo Park

National Park Service, San Francisco

National Park Service, Redwood National Park, Crescent City

Environmental Protection Agency, San Francisco & Washington, D.C.

CONGRESSIONAL REPRESENTATIVES

U.S. House of Representatives

Hon. Douglas Bosco, Eureka & Santa Rosa, CA, and Washington, D.C.
Hon. Barbara Boxer, San Rafael, CA, and Washington, D.C.

U.S. Senate

Hon. Alan Cranston, San Francisco, CA, and Washington, D.C.
Hon. Pete Wilson, San Francisco, CA, and Washington, D.C.

STATE LEGISLATURE

California State Assembly

Hon. William Filante, San Rafael, Sacramento
Hon. Bev Hansen, Santa Rosa, Sacramento
Hon. Dan Hauser, Eureka, Sacramento

California State Senate

Hon. Barry Keene, Vallejo, Sacramento
Hon. Jim Nielsen, Chico, Sacramento

STATE AGENCIES

Office of the Governor

California Office of Planning and Research (State Clearinghouse)
California Coastal Commission, San Francisco
California Department of Fish & Game, Yountville, Ukiah, Eureka, Sacramento
California Department of Forestry & Fire Protection, Ukiah, Fortuna, Santa Rosa
California State Lands Commission, Sacramento
California Division of Mines & Geology, Pleasant Hill
California Department of Parks & Recreation, Carlotto, Weott, Garberville, Eureka
California Farm Bureau Federation, Sacramento
Humboldt State University, Dr. John Sawyer, Arcata
University of California Cooperative Extension Service, Ukiah

COUNTY GOVERNMENT

County Supervisors

Del Norte County Board of Supervisors, Crescent City
Humboldt County Board of Supervisors, Eureka
Mendocino County Board of Supervisors, Ukiah
Sonoma County Board of Supervisors, Santa Rosa
Trinity County Board of Supervisors, Weaverville

County and Local Agencies

Humboldt Bay Harbor District, Eureka
Humboldt County Planning Department, Eureka
Mendocino County Farm Advisor, Ukiah
Mendocino County Fish & Game Advisory Committee, Ukiah
Mendocino County Parks & Beaches, Ukiah
Mendocino County Planning Department, Ukiah
Sonoma County Parks Department, Santa Rosa
Sonoma County Planning Department, Santa Rosa
Trinity County Planning Department, Weaverville

INTERESTED GROUPS/ORGANIZATIONS

Big Foot Alliance, Natasha Pearson, Monte Rio
Bureau of Land Management, Ukiah District Advisory Council
Peter W. Barnard, Calpella
Irvin R. Brown, Ukiah
Thomas F. Clemens, Redding
Charles Edwin Green III, Sacramento
Mrs. Jean Jenny, Berkeley
Phillip A. Perry, Redding
John Reginato, Redding
Joe Russ IV, Ferndale
Anna Sparks, Eureka
James D. Stokes, Redding
Cahto Coalition, Michael Huddleston, Leggett
Cahto Tribe, Bert Sloan, Jr., Laytonville
Cal-Ore Association of Miners, Philip C. Dailey, Crescent City
California Wilderness Coalition, Jim Eaton, Davis
California Cattlemen's Association, Bill Branstetter, Ferndale
California Native Plant Society, Ken Berg, Arcata
California Native Plant Society, Ken Clark, Arcata
California Native Plant Society, Sally De Becker, Berkeley
California Native Plant Society, Alice Howard, Berkeley
California Native Plant Society, Steve Zachary, Ukiah
Coastal Mining Company, C.A. Dowd, Carson City, NV
Environmental Protection Information Center, Robert Sutherland, Garberville
Georgia-Pacific Corporation, Dow Jacobzoon, Fort Bragg
Mattole Restoration Council, Sam Camp, Honeydew
Mattole Watershed Taxpayers Association, Gil & Cecelia Gregori, Garberville
Mattole Watershed Taxpayers Association, Charlie Eagle, Phillipsville
Mendocino Public Lands Task Force, Joe Ferrara, Covelo
Mendo-Lake Pomo Council, Calpella
Mill Creek Ranch, Ruth Douglas, Laytonville
Mother Earth, Yvonne Reynolds, Covelo
Natural Resources Defense Council, Johanna H. Wald, San Francisco
Northcoast Environmental Center, Arcata
Pacific Gas & Electric, William Chilson, San Francisco
Red Mountain Association, Herb Roth, Leggett
Red Mountain Association, Richard & Jane Wilson, Piercy
Redwood Empire 4-Wheelers, Keith Jones, Eureka
Redwood Empire 4x4 Club, Glenn L. Graham, McKinleyville
Redwood Gun Club, Robert H. Fallis, Arcata
Sierra Club, Lynn Ryan, Arcata
Sierra Club, Ron Guenther, Fort Bragg
Sierra Club, Laurens H. Silver, San Francisco
Sierra Club, Lucille Vinyard, Trinidad
The Nature Conservancy, Steve Johnson, San Francisco
The Rural Institute, Don Morris, Willits
The Rural Institute, Bob Whitney, Willits
The Wilderness Society, Patricia Schifferle, San Francisco
Tom Long Watershed Association, Douglas Fir, Garberville
Tom Long Watershed Association, Jared Rossman, Redway
Trust for Public Lands, Harriet Burgess, San Francisco
Western Timber Services, Inc., Arcata, West Sacramento

INDIVIDUALS

Philip S. Barber, Willits
Katherine Barrows, La Quinta
Fred Bauer, Garberville
Nick Blackfield, Comptche
Donald Borthwick, Redway
David Brewer, Whitethorn
John Brennen, Phillipsville
Kim L. Butler, Redway
Marylee Bytheriver, Redway
Peter Childs, Miranda
Dana Dangler, Garberville
Jim Dangler, Garberville
Will & Roberta Daniel, Richmond
Deborah S. Deer, Garberville
Wes & Linda Edwards, Redway
Mark Foote, San Francisco
Diane Foster, Whitethorn
Arlo Hagler, Garberville
Jon R. Hollcraft, San Jose
J. Jergensen, Willits
Peter Kaufhold, Miranda
Dale M. Kaumans, El Sobrante
Caroline LaPrade, Garberville
Jim Lohr, Ukiah
Tom & Carla Lohr, Laytonville
Larry & Jeannie Malato, Phillipsville
S. McClatchy, Arcata
Marshall McNeil, Albion
Janina Miller, Laytonville
Jonell Friedkin Monschke, Miranda
Jeff Morosa, San Francisco
William Eugene Mulvihill III, Mendocino
Peter M. Powell, Redway
Jenny Revotskie, Miranda
Priscilla Samas, Mendocino
Susan Shafer, Corte Madera
Robert 'Woods' Sutherland, Redway
Larry Todd, Willits
Steven Weissbluth, Miranda
James Whitley, Leggett

**SUMMARY OF WRITTEN COMMENTS ON DRAFT RMP/EIS
BLM RESPONSES**

<u>Letter Number</u>	<u>Commentor</u>
1. ARA-100	California Coastal Commission - San Francisco
2. ARA-103	Sierra Club - Redwood Chapter - Arcata
3. ARA-105	Mattole Restoration Council - Garberville
4. ARA-106	County of Humboldt - Eureka
5. ARA-115	Siskiyou Forestry Consultants - Arcata
6. ARA-116	Christine Klein - Bayside
7. ARA-119	Beginnings, Inc. - Redway
8. ARA-149	Environmental Protection and Information Center, Inc. (Gregori) - Garberville
9. ARA-151	Cahto Coalition (Day) - Leggett
10. ARA-165	Environmental Protection and Information Center, Inc. (Derksen) - Garberville
11. ARA-230	Stuart Nichols - McKinleyville
12. ARA-302	Mr. and Mrs. Average Citizen - Petition
13. ARA-304	Douglas H. Boscoe - Congress of the United States - Washington, D.C.
14. ARA-306	Fish and Wildlife Service - San Francisco
15. ARA-317	State Lands Commission - Sacramento
16. ARA-320	Natural Resources Defense Council - San Francisco
17. ARA-326	Barbara Sher - Whitethorn
18. ARA-327	Michael Balt - Miranda
19. ARA-338	Larry and Jeannie Malato - Avon, Colorado
20. ARA-339	Gail Gibson - Phillipsville
21. ARA-393	Bonnie Burgess - Leggett
22. ARA-405	Douglas Fir - Garberville
23. ARA-407	Ron Guenther - Fort Bragg

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|-----|---------|--|
| 24. | ARA-412 | Daniel Cahoon - Fortuna |
| 25. | ARA-414 | Harry Vaughn - Miranda |
| 26. | ARA-417 | Environmental Defense Network - Willits |
| 27. | ARA-430 | Petition - ORV Park |
| 28. | ARA-435 | Vernon Bonham - Garberville |
| 29. | ARA-442 | Defenders of Wildlife - Sacramento |
| 30. | ARA-445 | C. Page - Trinidad |
| 31. | ARA-449 | The Northcoast Environmental Center - Arcata |
| 32. | ARA-456 | Lillian Bieber - one petition - Great Neck, New York |
| 33. | ARA-458 | Frank Zern - Santa Maria |
| 34. | ARA-473 | Cahto Coalition (Huddleston) - Leggett |
| 35. | ARA-480 | The Nature Conservancy - San Francisco |
| 36. | ARA-481 | James C. Owens - Bayside |
| 37. | ARA-482 | Wayne E. Stephens - Garberville |
| 38. | ARA-490 | Petition - ORV use Samoa |
| 39. | ARA-516 | Judie Petrey - Scotia |
| 40. | ARA-517 | The Wilderness Society - California/Nevada - San Francisco |
| 41. | ARA-520 | California Wilderness Coalition - Davis |
| 42. | ARA-568 | The Resources Agency of California - Sacramento |
| 43. | ARA-570 | U.S. Environmental Protection Agency - San Francisco |
| 44. | ARA-609 | Linda Peters - Ukiah |
| 45. | ARA-623 | County of Humboldt - Ukiah |
| 46. | ARA-635 | Vielta Roberts - Eureka |

CALIFORNIA COASTAL COMMISSION

631 HOWARD STREET, 4TH FLOOR
SAN FRANCISCO, CA 94105
(415) 543-8555



April 8, 1988

ARA-100

John Lloyd, Arcata Resource Area Manager
Bureau of Land Management
1125 16th Street
Arcata, CA 95521

RE. Comments on the Draft Resource Management Plan and Environmental Impact
Statement (EIS) for the Arcata planning area

Dear Mr. Lloyd:

Thank you for the opportunity to review and comment on the above-referenced draft EIS. Only the activities within the Samoa Peninsula Management Area have the potential to affect land and water uses in the coastal zone.

The Commission has previously concurred (CD-27-82) with a consistency determination by the Bureau of Land Management (BLM) for the development of an off-road vehicle (ORV) recreation area. The Commission found that the proposed recreation area is consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

Although the proposed project for the Samoa Peninsula is described as "no project," the activity includes the acquisition and management of an area known as the "Manila Dunes." The acquisition and management of the Manila Dunes was not included in the earlier consistency determination. When property in the coastal zone is acquired by the federal government, the land is removed from the coastal zone, and thus, with certain exceptions, from the state's direct regulatory jurisdiction under the California Coastal Act. At the same time, federal acquisition subjects the land to new sources of regulation and possible changes in land use which could have effects on coastal zone resources. Any activity on such lands which results in effects on the coastal zone is subject to the federal consistency provisions of the federal Coastal Zone Management Act (CZMA) (16 U.S.C. Section 1451 et seq.). Under these provisions, the Commission would review such activities for consistency with the CCMP.

For land in the coastal zone, development activities and planning decisions must meet the specific policy requirements of Chapter 3 of the Coastal Act, as implemented by the Commission either in case-by-case permit review or through a certification of local coastal programs. Once land has been acquired by the federal government, the land in question is excluded from the coastal zone. Therefore, federal and federally authorized activities are reviewed by the Commission under the consistency provisions of the CZMA only to the extent that they have effects which "spill-over" into the coastal zone from the excluded land. Permit review, as noted, is limited to requirements which do not conflict with federal law.

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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

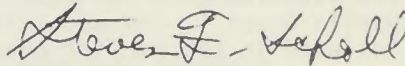
Management of the property to protect its resource values could affect the existing recreational uses of the dunes. Our concern is that adequate consideration of recreational use be given attention at this stage, rather than at a later stage when Commission review authority is limited as described above. Although we are not suggesting that recreational use necessarily has priority over other uses, we are suggesting that the Coastal Act does set up a system for considering competing uses. This system should receive explicit consideration at the acquisition stage.

The management of the Manila dunes also raises concerns about conflicting Coastal Act resources. The EIS indicates that the area will be managed for its habitat values. The EIS, however, references an ORV "corridor" through the Manila dunes. The location of the corridor is not identified, nor are potential conflicts between recreation uses and habitat protection discussed. Since the Manila Dunes are part of a dynamic dune system that is on both federal land (outside the coastal zone) and on land inside the coastal zone, the impacts to the dune habitat on the federal land could directly affect resources in the coastal zone. 100-1

Therefore, both the proposed acquisition and management of the Manila Dunes raises Coastal Act concerns and has the potential to directly affect the coastal zone. As such, this federal activity is subject to the consistency review procedures established under the CZMA.

If you have any questions or need additional information regarding the federal consistency process, please feel free to contact Jim Raives of the Commission staff.

Sincerely,



STEVEN F. SCHOLL
Assistant Deputy Director

cc: Noah Tilghman

RESPONSE TO COMMENT LETTER 100

- 100-1 The ORV 'corridor' in the Manila Dunes area as referenced in the DEIS, has been dropped. In the FEIS the proposed action makes reference to limiting ORV use to certain portions of the Manila Dunes area, mainly 47 acres of mostly unvegetated dunes. Sensitive fore dune habitat and the spruce forest area will be closed to all ORV use, approximately 65 acres.



SIERRA CLUB

Redwood Chapter

North Group

POST OFFICE BOX 238

ARCATA, CALIFORNIA 95521

March 15, 1988

ARA-103

Comments on the Draft Arcata Planning Area Resource Management Plan and Environmental Impact Statement, December 1987.

In general, we find the Draft Resource Management Plan inadequate as a planning document and unacceptable in most of its proposals.

Ambiguous wording, such as identification of the proposal to build a 125-acre ORV facility on the Samoa Dunes as the NO ACTION alternative; insufficient detail, such as failure to identify the "narrow corridor" in the Manila Dunes where ORV's will be permitted; and lack of information, such as proposing to dispose of 77,360 acres of public land or 62% of the Arcata Planning Area without any discussion of the resource values to be lost are all examples of the document's shortcomings as a management plan. In addition, these shortcomings make it difficult for the public to participate knowledgeably in the review of the document or to fully understand the implications of the proposals. 103-1

Unacceptable proposals in the RMP include the following:

1. Construction of a 125-acre ORV facility on the Samoa Dunes and inclusion of an ORV access corridor to the joint-management area on the Manila Dunes.

The Peninsula, which stretches from the Bay's entrance north to the Mad River, is an area of rare habitat types and provides suitable conditions for the Menzies' wallflower, a State-listed Endangered species and candidate species for Federal designation. Habitat types on the Peninsula include dune hollows, freshwater ponds, scrub dunes, salt marshes, sandy beaches, forests, barren moving dunes, stabilized scrublands, and intertidal flats. A January 27, 1986 staff report to the California Coastal Commission had this to say about Peninsula habitats:

Dune hollows are among the rarest and most threatened of California habitat types. According to preliminary analysis by the Department of Fish and Game's Natural Diversity Data Base, similar dune hollow habitats occur in fewer than 40 sites worldwide. These dune hollow habitats are considered to be critically rare and endangered worldwide.

...dune scrub community is among the scarcest of habitats. According to preliminary analysis by the Department of Fish and Game's Natural Diversity

Date Base, northern coastal dune scrub habitats are critically rare, with less than 21 known examples worldwide, and are endangered throughout their range. In Humboldt County, significant native dune scrub habitats are found only on the North Spit.

According to Ken Berg, Botanist with the California Native Plant Society, "(t)he fate of dune habitats on the North Spit... is especially critical to the survival of Menzies' wallflower (Erysimum menziesii). The Samoa Peninsula is the largest of the 3 known localities of the species worldwide. It is larger in area than the other 2 localities combined (Monterey Peninsula, Monterey County and Ten Mile Dunes, Mendocino County)."

Despite these impressive statistics, BLM proposes to expand present ORV use at Samoa from an estimated 8,000 visitor days per year to 17,000 visitor days per year by constructing an ORV facility. Furthermore, it proposes to provide a corridor for ORV access to an area on the Manila Dunes which was to be managed for passive recreation, environmental education and resource protection by BLM, The Nature Conservancy, and Louisiana Pacific. The RMP fails to discuss the current effort by the County of Humboldt to secure funding for Peninsula-wide planning to determine, among other things, appropriate areas for ORV use. Local ORV clubs have already indicated that BLM's proposed facility will be inadequate and, in fact, will not be used by local ORV riders.

103-2

Although BLM proposes to protect a wetland area and 40 acres of Menzies' habitat, the fact remains that its facility will significantly expand ORV use on the Peninsula and displace garbage dumping, shooting, vandalism, and beer parties. The off-site consequences of this expanded use and displacement of activities have never been assessed in an environmental document.

We support Peninsula-wide planning in order to determine the appropriate area for ORV use and to insure protection of the fragile habitat types. BLM should abandon its present ORV proposals and participate in the County's planning effort for the Peninsula.

103-3

2. Intensive timber management in the Lacks Creek area.

The 4500-acre Lacks Creek management area is an upper-basin tributary to Redwood Creek. Under Public Law 95-250, the Redwood Park Expansion Act of 1978, the Secretary of the Interior "shall also manage any additional Federal lands under his jurisdiction that are within the hydrographic basin of Redwood Creek in a manner which will minimize sedimentation which could affect the park, and in coordination with plans for sediment management within the basin" (Section 101(a)(6)).

The RMP fails to mention this mandate or to consider whether or not the preferred alternative of intensive timber management in Lacks Creek is consistent with Section 101(a)(6). An assessment of potential impacts to Redwood Creek resulting from roads and logging

103-4

on BLM's Lacks Creek land should be presented in the RMP/EIS.

The Lacks Creek management area includes old-growth, mixed evergreen stands which are representative of low-elevation Doug fir forest in the North Coast Range. Because of intensive logging, this major ecosystem is becoming scarce in northwestern California. As noted in a BLM Memorandum, dated June 5, 1981, "(b)locks large enough to sustain the major life components of this community are gradually disappearing....In the lower elevation areas of the coast range of northern California, BLM is the major land holding agency with an opportunity to preserve significant acreages of this habitat" (Old-Growth Reserve System Documentation, 1986).. The RMP/EIS does not assess the implications of hastening the loss of this ecosystem type by logging old-growth stands in Lacks Creek, although the Federal Land Policy and Management Act of 1976 (FLPMA) specifically requires land management plans to "consider the relative scarcity of the values involved" (Sec. 202(c)(6) and to "weigh long-term benefits to the public against short-term benefits" (Sec. 202(c)(7)).

103-5

The Preferred Alternative (p. 2-19, 2-20) makes no provision for spotted owl management, although this species was located in the Lacks Creek area during the Nature Conservancy inventory in 1983. BLM plans only to "monitor spotted owls"(p. 2-20) as it "increase(s) timber production through intensive management practices" (p.2-19).

103-6

The Preferred Alternative makes no provision for management of cultural resources and even states (p.3-9) that the "likelihood of finding significant prehistoric values on public lands is low because of very steep slopes." However, under the ENHANCEMENT OF NATURAL VALUES alternative (p. 2-28) management actions would "monitor known cultural resources" (emphasis added). Because of its location between Redwood Creek and the Hoopa Valley, areas of intense Native American use, the Lacks Creek area should be assessed for cultural resources.

103-7

Lacks Creek should be withdrawn from the timber production base and managed instead for wildlife habitat, watershed protection, biological diversity, and scientific research. Lacks Creek could be designated as a RNA/ACEC or as part of a BLM Old-Growth Reserve System, along with other old-growth stands in the Arcata Planning Area.

3. Disposal of 77,360 acres of public land which represents 62% of the entire Arcata Planning Area.

The RMP/EIS proposes to dispose of the entire 66,500 acres in the Covelo Management Area, 3,000 acres in the Red Mountain Management Area, and 7,700 acres of scattered tracts. Another 160 acres in the King Range would be available to the California Department of Parks and Recreation.

We are particularly concerned that BLM proposes to sell and/or exchange public lands about which the public knows little or nothing. The RMP/EIS presents virtually no information about the resource values of these lands or the consequences of their disposal. The rationale for this disposal is to "enhance the manageability of public lands and improve the cost-effectiveness of resource management by consolidation of Federal lands in areas of high visibility with significant Federal ownership" (p. 2-87). Consolidation, in this case, appears to be acquisition of land for single-use commercial timber production in the King Range area. That, in itself, is questionable, since BLM's land use plans must "use and observe the principles of multiple use..." (FLPMA, Sec. 202 (c)(1)). Isolated, distant, and inaccessible tracts are to be disposed of because these conditions make them unsuited for management. On the other hand, it is this very condition of unmanageability that in the long run may provide the greatest long-term benefits to the public. Unmanaged scattered tracts offer a variety of ecological values worthy of protection--fish and wildlife habitat, watershed functions, biological diversity, gene conservation, scientific study, etc.

103-8

The public can make no judgment regarding land disposal based on the RMP/EIS which provides little or no information about these disposal areas. However, contingent upon adequate information regarding the resource values of the Covelo lands and their future management, we might support transfer of these lands to the Mendocino National Forest.

103-9

Disposal of areas identified by BLM in 1981 as worthy of consideration as part of an Old-Growth Reserve System is another matter. Although FLPMA provides that land use plans shall "rely, to the extent it is available, on the inventory of the public lands, their resources, and other values" (Sec. 202(c)(4)), BLM has not cited data in the RMP/EIS from its 1986 inventory, Old-Growth Reserve System Documentation, prepared by Katherine Barrows in three reports (1983, 84, 85) as part of a cooperative arrangement with The Nature Conservancy. That inventory included ten old-growth areas, seven of which were on a list of 15 identified for survey in a 1981 BLM Memorandum: Butte Creek, Lacks Creek, Jewett Rock, Cedar Creek, Gilham Butte, Big Bend, and Laqua Buttes. Three other areas--Honeydew Creek in the King Range, White Rock Creek and the Northern California Coast Range Preserve--were added to the inventory.

103-10

Information in this inventory is extremely relevant to the RMP/EIS; however, BLM has chosen not to cite the document and, in fact, proposes to dispose of several areas which were inventoried for inclusion in an Old-Growth Reserve System. The fate of other inventoried areas and areas on the original 1981 list is not clearly revealed in the RMP/EIS. Because of our concern and BLM's serious omission of information, we felt it important to quote extensively from Katherine Barrows' 1985 report, Old Growth Forest Reserve System Management Recommendations:

103-11

In 1981, the Ukiah District of the Bureau of Land Management (BLM) established an Old Growth Reserve System....The Old Growth Reserve system was conceived to provide long term protection for the resources contained within the units "for the purpose of promoting regional biological diversity, conserving plant and animal genetic stock, preserving sensitive or scarce organisms, and providing opportunities for scientific research." The system was established by administrative designation to include 16 areas in Mendocino and Humboldt counties. Seven of these areas were removed from the system to meet other program goals. (emphasis added) The remaining nine areas await final management designation....

Not all of the units proposed for the system are equally suitable as Old Growth Reserves. This proposal describes each of the units and ranks them according to criteria which relate to their management as Old Growth Reserves. These criteria include: 1) SIZE...2) SHAPE...3) STAND QUALITY AND CONDITION...4) STAND CONTINUITY...5) DEFENSIBILITY...6) ASSOCIATED VEGETATION TYPES...7) OLD GROWTH ASSOCIATED SPECIES...8) MANAGEMENT CONSIDERATIONS....

There is considerable variation in the degree to which the reserve units satisfy the different criteria. None of the units includes an entire watershed so that in all cases the old growth stands are fragmented to some extent. Reserves which include the headwaters of these small drainages were given a higher rating as the effects of activities upstream would not be a concern. The negative aspects of this fragmentation are balanced in some cases by the stand quality. For example, Butte Creek is rated highly; although the old growth is located only on one side of Butte Creek, it extends up to the ridgeline and is a high quality example of old growth Douglas-fir forest.

Two of the areas do not warrant consideration as old growth reserves: Big Bend is too small and fragmented to provide valuable old growth habitat, Jewett Rock does not include any old growth stands. The recruitment stands of Douglas-fir are small and with low density of Douglas fir.

Three of the areas are well suited as old growth reserves. Gilham Butte is large, with the most extensive stands of old growth vegetation and

representative diversity of associated vegetation types; Cedar Creek exhibits a representative sample of old growth vegetation and is significant because of its proximity to the Northern California Coast Range Preserve. Butte Creek has an excellent example of old growth forest and a remarkable population of old growth associated wildlife species.

Some of the remaining areas may be suitable as old growth reserves, though the stands are more limited in extent and quality. Iaqua Buttes supported at least one spotted owl in 1984; a pair may have become established since our survey. Its proximity to established owl pairs in the Six Rivers National Forest gives the potential for a cooperative management effort to protect a population of spotted owls. Lacks Creek has limited acreage of old growth Douglas-fir, difficult access, and an irregular shaped boundary. It is currently protected under the Redwood National Park Protection Zone; its significance as habitat for spotted owls should be determined before management decisions are finalized.

The old growth stands at White Rock Creek are very small in size; the two old growth areas are approximately 75 and 25 acres in extent. However, these sites each support spotted owls. The larger area has had a breeding pair which successfully produced one owlet in 1984. These old growth stands are also significant because of their proximity to the Northern California Coast Range Preserve. These units might serve as important research sites, especially with respect to the small size of these spotted owl territories.

Since the original proposal for an old growth reserve system was made in 1981, the importance of protected examples of undisturbed old growth Douglas-fir forest has increased considerably. The California Natural Diversity Data Base now estimates that less than 5% of an original two million acres of old growth habitat will remain protected. The old growth forest lands under BLM ownership in the Ukiah District are, in addition to the Northern California Coast Range Preserve, the only examples of the low elevation coastal phase of this forest type. The Old Growth Reserve system presents an excellent opportunity to preserve significant acreages of this habitat. (Emphasis added)

We support the establish of an Old-Growth Reserve System in the Arcata Planning Area. Gilham Butte, Butte Creek, Big Bend, Cedar Creek, Lacks Creek, Iaqua Buttes, White Rock Creek, and the Northern California Coast Range Preserve should be included in that system as designated Old-Growth Reserves. In addition, Honeydew Creek should be included in a Congressionally-designated King Range Wilderness. Jewett Rock should be retained for its diversity of vegetative types and habitat values. For our information we are requesting BLM to furnish us with a status report of the eight areas which were on the original list, but were not inventoried: Davis Creek, West Larabee, Salt Creek, Charlton Creek/White Slide, Hulls Creek, Signal Ridge/Doty Creek, Willis Ridge, and Mill Creek.

103-12

Other considerations:

To improve its management of Arcata Planning Area lands and resources, BLM should prepare a spotted owl management plan for public review and eventual agency adoption. This plan should reflect current scientific information on habitat needs and demographic characteristics of the northern spotted owl. BLM's present policy to provide only 300 acres per pair of owls is totally inadequate. In a 1986 report, the National Audubon Society's Advisory Panel on the Spotted Owl recommended that 2,500 acres be set aside for each pair of owls in California. Obviously, BLM will not be able to provide that amount of habitat which means there must be cooperative management efforts developed between the BLM, Forest Service, other public lands agencies and private landowners.

103-13

BLM should undertake a systematic inventory of its lands for cultural resources. A cultural resources management plan should be prepared for public review and eventual agency adoption so that identified resources will be properly managed to protect their integrity and cultural and scientific values.

103-14

We support the development of a recreation plan which emphasizes a good trail system, where appropriate, to serve the public's need for passive recreation opportunities. A trail from Humboldt Redwoods State Park through Gilham Butte and into the King Range has been considered by BLM in the past and we encourage a renewed interest in such an effort.

We support BLM's proposal to withdraw Butte Creek from timber production and recommend its inclusion in the Old-Growth Reserve System. We also support designation of Red Mountain as a Research Natural Area. We support timber management prescriptions which avoid clear cutting and the use of herbicides.

Thank you for this opportunity to express our views. We will appreciate consideration of these comments.

For the Executive Committee,

Lynn Ryan
Lynn Ryan

Susie Van Kirk
Susie Van Kirk

RESPONSE TO COMMENT LETTER 103

- 103-1 See responses 100-1, 417-1, 417-2 on the Samoa/Manila Dunes concerns. Impacts as they involve specific issues identified are addressed in Chapter 4, Environmental Consequences. Special 'non-issue- resources are address with site specific environmental assessments. See responses 568-7.
- 103-2 See response 520-1.
- 103-3 See response 480-1 and p. 2-4, FEIS.
- 103-4 Reference to coordination with Redwood National Park (RNP) on potential impacts to downstream resources (Redwood Creek) and enhancement of these resources are contained on p. 2-32 of the FEIS. See response 149-34 for specific actions in Lacks Creek.
- 103-5 See response 417-12 on old-growth reserve designation in Lacks Creek. Impacts to spotted owls and other old-growth related values are discussed in Chapter 4, FEIS. Chapter 4 also weighs long-term and short-term benefits of harvesting old-growth.
- 103-6 See response 417-12.
- 103-7 See response 417-8.
- 103-8 The amount of acres to be disposed of has been changed in the FEIS, see Chapters 2 and 4 for changes by management areas. See responses 405-5, 473-1, 473-11 and 481-5. See response 405-11 on management of scattered tracts.
- 103-9 See response 568-7 on disposal of BLM lands within the Covelo Management Area.
- 103-10 Again, see response 405-5 on disposal/retention of old-growth reserve areas. See response 405-6, 165-3 and p. 1-4 of FEIS for reference to TNC data and development of the Old-Growth Reserve System.
- 103-11 See response 520-5 on Gilham Butte and Iaqua Butte old-growth designations. Also see response 165-3 on the analysis of management situation (AMS, 1986) document and it's availability and use. See p. 1-4, 1-6 of FEIS, Chapter 3, Affected Environment, Old-Growth Characteristics and Chapter 4, Environmental Consequences, Impact of Spotted Owls and Other Old-Growth Values of the FEIS for documentation of old-growth reserve areas and impacts to these reserves.
- 103-12 See p. 1-4, FEIS for list of old-growth reserves established by the Proposed RMP/Final EIS. Explanation of the determination of Jewett Rock, Hulls Creek, and Charlton Creek/White Slide is contained on p. 1-6, FEIS.

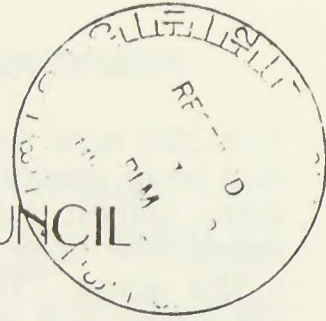
Explanation of non-inventoried 'original' old-growth reserve candidates are contained in the Resource Area's Old-Growth Reserve Study Files.

103-13 See response 149-9.

103-14 See response 417-8 on cultural resources.



ARA-105



MATTOLE RESTORATION COUNCIL

18 March 1988

State Director
Bureau of Land Management
2800 Cottage Way
Sacramento CA 95825

Dear sir:

We request that, because of the great significance of the issues addressed by the Arcata Resource Management Plan and DEIS, especially the fate of old growth reserves and old growth dependent species, including the spotted owl, that PUBLIC HEARINGS be held on this issue.

The Mattole Restoration Council has recently completed a detailed map of the distribution of coniferous old growth forests in the Mattole basin. Our mapping demonstrates over 1000 acres of old growth standing on Gilham Butte and nearby parcels managed by BLM and recommended for disposal. Your DEIS claims that only 390 acres of old growth are present in these reserves.

105-1

NEPA requires public hearings if there is significant environmental controversy surrounding a DEIS. The discrepancy in figures mentioned above should activate this requirement even if there were not a dozen other areas of contention and controversy within this management plan.

Please keep me informed on this issue.

Thankyou,

Freeman House

Freeman House
for the Mattole Restoration Council

h Res
Ch/Ocs
Ch/Admin
Ch/Min
Arcata RA
LRA
Redding RA

cc John Lloyd

3848 WILDER RIDGE RD., GARBERVILLE, CA 95440

RESPONSE TO COMMENT LETTER 105

- 105-1 The 390 acre figure as contained in the DEIS represents areas that have predominately old-growth characteristics such as age, size, certain number of tree/acre and an associated wood debris/litter layer. The old-growth reserve size for Gilham Butte is 1,320 acres. This includes not only the 390 acres of 'true' old-growth but other acreage of mature Douglas-fir stands that have one or two old-growth characteristics present but not all. For the record, public hearings were held May 16 & 17, 1988.



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

825 5TH STREET

EUREKA, CALIFORNIA 95501-1172 PHONE (707) 445-7471

March 23, 1988

ARA-106

Al Wright
District Manager
Bureau of Land Management,
555 Leslie Street
Ukiah, CA 95482-5599

Dear Mr. Wright:

I am requesting that the Bureau of Land Management conduct a formal public hearing to receive public comment on the Arcata Planning Area Draft Resource Management Plan. I recently attended a public meeting on the Plan in which the BLM used an unusual procedure which either intentionally or unintentionally served to diffuse public concerns. Although the small group meetings with resource specialists are of some value, this format does not offer the opportunity for public questioning and answers or for verbal comments to be formally put on record.

The Department of the Interior employed this approach once before at the December 1986 scoping meeting on Lease Sale 91 in Eureka. At that time concerned citizens, with the support of Congressman Bosco, were able to successfully affect a change in the process which resulted in testimony being presented and recorded.

The Arcata Area Draft Plan addresses several issues of critical concern to area local residents. It would seem appropriate that the BLM conduct a hearing in which public comments are formally recorded. Your cooperation in granting this request to schedule a hearing will be greatly appreciated.

Thank you for your attention to this matter.

Sincerely,

WESLEY CHESBRO
Third District Supervisor

WC/bb

RECEIVED
MAR 31 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

SISKIYOU FORESTRY CONSULTANTS

RPF 1877

P.O. Box 241 Arcata CA 95521

707-839-0497

ARA-115

March 30, 1988

Mr. Al Wright
Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA. 95521

RECEIVED
APR 6 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Dear Mr. Wright:

Shown below are my comments on the Resource Management Plan and EIS for the Arcata Planning Area. Please enclose my comments and detail your responses in the final EIS.

Given the diversity of the lands under question I believe the RMP and EIS are essentially adequate to address the issues. In general the RMP and EIS also contain what appear to be logical alternatives in some cases. In a few situations the breadth and range of the alternatives appear to be inadequate to address the concerns and opportunities which your staff has raised or the issues which the public have raised.

115-1

The purpose and need for action should be strengthened to more clearly define why the revision to the SYU 13 plan is needed. In particular the disposing of so many acres of land within the resource area needs to be addressed in the state wide context of the other BLM areas.

115-2

The relationship between the SYU 13 plan and the proposed action needs to be more clearly defined. In particular the old growth management prescriptions should be included within each of the management areas to which timber management applies.

115-3

The reasoning behind deletion of many of the scattered tract old growth candidate reserves needs to be much more clearly explained.

115-4

The designation of the various areas appears arbitrary. The RMP and the EIS need to state the reason for the designation of the various areas. In some instances the scattered blocks of BLM land could easily have been incorporated into adjacent BLM areas. In particular the Gilham Butte area would logically fall into the King Range area.

115-5

The RMP and the EIS do not include an analysis of the effort which the State Lands Commission would need to make to obtain access to isolated parcels. In particular the Gilham Butte area

115-6

has what appears to be isolated access given the easements and the landownerships which surround the parcel. I have worked on adjacent parcels to the Gilham Butte area and understand and appreciate why the surrounding owners will not grant access. In some cases, the access to the east from Gilham Butte would require easements which would extend the length of the Salmon Creek road, easily 25 miles.

There is no documentation for the yields expected from the lands nor is the Oregon Office BLM guides for benefit cost analysis explained. Given the figures presented for B/C ratios it appears that future costs are discounted against current yields, or that costs for establishment must not include all costs for carrying a stand through a single rotation. In addition, the thinning strategy quoted from Bruce and Reukema involves thinning each acre three times as well as an overwood removal twice (once at 115 year and once at 200 years). The impacts of scarring, mortality, etc. on the residual stand, especially on steep mountain slopes appear to be underestimated. You need to document more clearly what the yield scenarios are base upon.

115-7

The plan mentions several times that large areas of cutover land are not successfully regenerated. You need to document why these lands are not successfully regenerated, why the current plan would tend to result in successful regeneration, and what you plan to do with these poorly regenerated lands. You need to consider and document the investment strategies which could be pursued within each management area to provide a positive return on investment within each area.

115-8

Comments on each area and the different alternatives follow:

Samoa Dunes

The preferred alternative assumes that some God like oversight will ensure that "... vehicles will be LIMITED (emphasis yours) to a narrow corridor...". The preferred alternative is substantially deficient without providing mitigation for vehicle non-compliance. The preferred alternative must include enforcement activities which will ensure the biological integrity of the Manilla dunes.

115-9

I would suggest that the best alternative for the area is the enhancement of natural values alternative.

Lacks Creek

The preferred alternative does not discuss how the yields were determined, the relationship of the parcel to the Hoopa Indian Reservation, the "island biogeography" of the parcel, nor the desire of the Park Service to maintain the lands in their existing status.

115-10

SISKIYOU FORESTRY CONSULTANTS

I would instead suggest that the Enhancement of Natural Values alternative would best serve the old growth dependent wildlife in the area. The Lacks Creek parcel would provide a suitable stepping stone to the high quality timber on the Hoopa Valley Indian Reservation in the Ranger Mountain area as well as the headwaters of Pine Creek.

If the BLM were to acquire the Russell properties which just happen to be 1800 acres, and lie between the Lacks Creek and the Hoopa Valley Tribe properties, a managed old growth, ecosystem could easily be established.

The Lacks Creek area should be managed for recreation and old growth dependent wildlife habitat area. I support the Enhancement of Natural Values alternative.

Butte Creek

The preferred alternative is the best choice for the area.

King Range Vicinity

The preferred alternative is the best choice for the area, with the exception that the Gilham Buttes area should be incorporated into the management area, even though the area is outside of the Mattole drainage. Access to the area is however, best developed from the Mattole River. In addition, the area is long been one which has stirred public sentiment and, if nothing else, deserves either incorporation into the King Range alternative, or else should be designated as it's own area.

151-11

Red Mountain

The preferred alternative is the best choice for the area.

Covelo Area

The administrative adjustments alternative should establish a priority for scattered parcels adjacent to the Round Valley Indian reservation where blocking of ownerships would produce a more logical boundary than with the Forest Service. Lands should not be disposed of to private interests, but instead should be retained. Subsurface mineral rights should be disposed of.

Scattered Tracts

The major old growth areas should be retained. Truly shotgun parcels should be disposed of. Lands adjacent to the Hoopa Valley Indian Reservation should be traded to the Tribe (i.e. those in Little Pine Creek, Pine Creek and the Klamath River).

SISKIYOU FORESTRY CONSULTANTS

RESPONSE TO COMMENT LETTER 115

- 115-1 Each management area contains a range of alternatives that address the issue(s) identified by the RMP/EIS scoping process. See responses 417-9 and 517-6.
- 115-2 The RMP/EIS is not intended as a revision to SYU-13 Timber Management Plan but to provide a basic 'road map' for the management of all resources in the Arcata Resource Area (excluding the King Range National Conservation Area). See p. 1-4 to 1-12 of FEIS, for existing and ongoing decisions incorporated by reference and general policy and standard operating procedures for additional information supporting the purpose and need for action.
- 115-3 See comment 405-1 and 405-5.
- 115-4 See comment 520-5.
- 115-5 The designation of the various management areas is explained on p. 2-2 of the DEIS. Geographic location was not the only criteria used to delineate a management area.
- 115-6 The analysis of access needs that the State Lands Commission would require if and when they acquired a certain tract of BLM land is beyond the scope of this EIS.
- 115-7 The documentation of yields, the economic analysis used and silvicultural strategies employed are contained in the analysis of management situations (1986) completed during the initial phase of the RMP process and the SYU-13 Timber EIS (1980). See response 165-3.
- 115-8 Regeneration and various investment strategies are discussed in the forest management section of the AMS (1986). See response 115-7.
- 115-9 The description of the Preferred Alternative has been modified in the FEIS to better define the closure areas on Manila Dunes. Enforcement activities will be a major part of the management scheme for the Samoa Peninsula management area. Details of ORV and trespass control measures will be outlined in site-specific activity plans for the area.
- 115-10 See response 115-7 for yield determination analysis. Description of the Lacks Creek management area appears on p. 3-7 of the DEIS. The Park Service has expressed a desire to protect the downstream resources of the Redwood National Park (Redwood Creek) by monitoring and coordinating land management actions within specific protection zone areas (i.e. Lacks Creek). Protection of these resources can occur under a multiple use management concept as proposed by FLPMA (1976).
- 115-11 See response 520-5. The Gilham Butte area by benefit of an ACEC designation will be managed as a separate area.

~~UNCLASSIFIED~~
351 Upper Creek Rd.
Bayside, CA 95524

Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

ARA-116

To whom it may concern:

I am writing in order to express my views regarding the Draft Resource Management Plan and Environmental Impact Statement for the Arcata Planning area.

There are a number of areas which I have problems with in this draft. First of all, the title. The management area is certainly not confined to the limits of Arcata; the title, "Arcata Planning Area", is quite misleading. This title becomes even more inappropriate after one realizes that what is being discussed here is not one project, but 2! The question comes to mind that if you lived in either Mendocino or Sonoma counties, would you be overly concerned with a document that sounded as though it had nothing to do with anything even in your county? I think that each one of the areas encompassed in this plan should have a separate EIS, not just one. The way the document reads now, there is very little data, and very few references for any given concern. One page of references for all ?? I would like to see that much for each area. I will now state my concerns for each of the respective areas.

Samoa Peninsula- I do not believe that the no action alternative should be the preferred. This area contains unique habitat, as well as endangered plant species. ORV use has increasingly dominated the environment and degraded the habitat to a point where the dunes have in many places been heavily damaged. Crime and all sorts of vandalism have reached a point where even you all, the BLM, approached the county Planning dept. with the hopes that this ORV problem you have created can be brought back under control again. I believe the BLM should chose the Enhancement of Natural Values Alternative, for at present the area has yet to be maintained in such a way that all interests are represented, in an appropriate manner.

Lacks Creek- I question the basis upon which such intensive timber harvest could be proposed. Old growth timber stands that exist within this area are completely overlooked. A pair of spotted owls is known to exist, as well as an individual, a clear indicator of the old growth integrity of this area. This area contains important old growth values that may serve as important islands to other neighboring areas. I resent the fact that the

BLM finds it necessary to be committed to the concept of "managing" old growth. This is not valid, regardless of Appendices 2-2 and 2-3. These appendixes discuss site preparation and release for chemical treatment, and BLM policy on conserving plants. I fail to see the correlation between this and managing old growth. I also have trouble with the label, nonproductive forest, for land that has been set aside as old growth habitat; this is a clear bias of views. From my perspective logged land is nonproductive. Therefore, I denounce the preferred alternative in favour of Enhancement of Natural Values, as the preferred alternative.

Butte Creek- I fully support this alternative. Hooray for the BLM. The preferred alt., Enhancement, is a great step forward.

King Range Vicinity- I support the enhancement alternative but question whether or not it will really turn out to be enhancement. I am concerned about the land wearing the label, "Suitable commercial forest land".

Red Mountain- I support the enhancement alternative, but question how an enhancement alternative could advocate such land disposal, as well as acquisition, all with the intention of timber management. This alt. is essentially identical to the no action. They should not look so similar when they are supposed to be two completely separate alts..

Covelov Vicinity- I question why there are only two alternatives. I do not support the administrative adjustments alternative, and would like to see an enhancement of natural values alternative included.

Scattered tracts- I advocate the enhancement of natural values alternative. Inagua Buttes is a suitable old growth area, and I wonder what has happened to Gilham Butte and Big Bend. Were they logged? That would almost seem to be against the law if that's the case. These areas should be given further consideration. Data is lacking as to exactly why these areas would be so difficult to manage; does it really need to be managed?

This concludes my discussion on each of the alternatives. I hope you give a great deal of thought to the future of this document; it contains many valuable lands that we, the public, have entrusted you with guardianship. Please remember that timber interests are not the only interests; the trees are just as much of a resource standing to many of us as they are to some lying down. Please don't let shortsightedness ruin our prospects for the future.

Sincerely,

Christine Klemm
3/30/88

BEGINNINGS, INC.

P.O. Box 1090 Redway, California 95560

18 March 1988

ARA-119

Bureau of Land Management

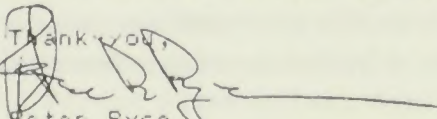
Sir/Madam,

I represent Beginnings Inc. and the children of Skyfish school. We are very much opposed to the intended sale of timber parcels on Gilham Butte. These parcels have on them unique stands of Old Growth fir forest that are a National Treasure and representative of a much older and much larger resource once on this land.

We often take our children out to explore and learn from the natural and scenic environment we live in. Because there are so few Old Growth environments left, particularly of this species, it is becoming increasingly important that what is left remain intact. These children and their children must be able to explore, enjoy and learn from such environments. The educational value of these stands can not be underestimated nor can the value of the habitat they support. For the relatively few dollars they would generate it would hardly be worth the great loss it would create. That loss would be total and none of us or our children would be around for a new cycle of forest growth to reach the proportions of these Old Growth Stands.

In addition we feel the sale or exchange of these old growth parcels for logged over land is not an equitable arrangement. Your argument of exchanging land so that the BLM land is all in nice neat contingent blocks may look good on paper or make "management" more efficient. However in reality your "management" is timber harvest and we feel the concept of management also involves stewardship for the protection and preservation of our land resources.

We, the children, teachers and community members reject your plan to sell our heritage. We vote for the NO ACTION alternative with regard to the sale of the scattered parcels which include Gilham Butte.

Thank you,

Peter Ryce
Director

RECEIVED
MAR 21 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Area Manager, John Lloyd
Bureau of Land Management
1125 16th Street
Arcata, Ca. 95521

July 18, 1988

Dear John,

Thankyou for the opportunity to comment on the DEIS/RMP. These comments (including 14 pages and Attachments A through N) are submitted on behalf of the Environmental Protection Information Center, Inc. (EPIC) Garberville, of which I am an officer and director. They are also submitted on behalf of myself as an individual and are in addition to the comments made during the scoping and at the public workshops and hearing in Garberville.

These comments are in addition to others comments submitted by members of EPIC during the review of this RMP as well as the original SYU 13 document which the RMP would supercede.

My focus has been on the Forest Management Program but I will state for the record that we support the ~~Sierra~~ Club position on the Samoa Peninsula/Manila Dunes Controversy to request that BLM involve the local people in area wide planning for this sensitive and unique ecosystem. As with our recommendations on your forestry program, we support an alternative that truly protects and enhances the natural values on these public lands.

Thankyou for your careful consideration of these, and the many other comments recieved from the intrested public on these matters.

Sincerely,

Cecelia Gregori

Cecelia Gregori
President, EPIC, INC.
Box 397
Garberville, CA. 95440

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JUL 22 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

These comments on the Draft Environmental Impact Statement and Resource Management Plan (DEIS/RMP) for the Arcata Resource Area submitted on behalf of the Environmental Protection Information Center (EPIC). This document violates the Federal Land Management Policy Act (FLMPA), the National Environmental Policy Act (NEPA), and Bureau of Land Management (BLM) Planning Regulations.

The proposed action represents a radical departure from BLM's 1981 Timber Management Program Sustained Yield Unit 13 (SYU 13). The emphasis on intensive timber management in the RMP fails to meet the mandate of BLM's multiple use policy outlined in Section 102(a)(7) FLMPA. The term "multiple use" under Section 103(c) means

149-1

"the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily the combination of uses that will give the greatest economic return or the greatest unit input."

"Multiple use" is defined in the Act as management for recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values." (FLMPA 43 USC Sec. 1701 et seq.)

Contrary to BLM's statement (RMP pg 1-7 #3) that "the basic timber management parameters as presented in the SYU 13 EIS/ROD are not changed," it is no longer viable to intensively manage timber resources due to a greater than 70% reduction in the timberland base. To make up for this loss BLM would like to scrap the remaining old-growth to expand the logging base. The DEIS/RMP is inadequate because it fails to present

149-2

149-3

a "no timber harvest alternative".

BLM claims (RMP pg 1-1) that existing land use plans no longer meet the needs or are responsive to address new resource demands. BLM has not conclusively shown there are new resource demands other than the fact that sensitive and endangered species will be irreversibly affected through implementation of this plan. (RMP pg 1-4 and Chapter 3)

149-4

As early as 1981 through the development of SYU 13, with extensive public-involvement, BLM recognized removal of existing old-growth forest would permanently alter valuable scientific and ecological habitat for many dependent wildlife species. (SYU 13 pgs 3-22; 4-17; 4-18; 4-23; 4-42) "The BLM controls a major amount of the remaining old-growth forest throughout the coastal area of northwestern California. This is particularly true for the mixed evergreen vegetation type. The forested aspect of these stands is readily apparent from the air, and it has been stated that you can often see where BLM land is, simply because that is where the trees are." (SYU 13 pg 3-21)

BLM is acting illegally in including the OGRs and old-growth scattered tracts as part of their allowable cut computation or disposal base (Sec 202(c)(6) "In the development and revision of land use plans, the Secretary shall-- consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values; (7) weigh long-term benefits to the public against short-term benefits). See references to natural areas in SYU 13 (pg 332) and RMP (pg 3-3) and the letter of 8/10/79 DOI to Sutherland(#G).

149-5

Despite the fact that old-growth reserves (OGR) are a legally committed mitigation (SYU 13 pg 4-53, and Table 4-8) finalized in the 1981 Record of Decision (Recommendation 10 pg 7) for the Red Mountain and scattered blocks Management Framework Plans (MFP) (SYU 13 pg 2-4; 2-25; Table 2-4)

149-6

BLM has disposed of over half of these critical public lands and proposes to administratively preserve only one of the remaining OGRs.

149-6

BLM fails to disclose significant new information on the effects of cutting or disposing of the old-growth lands. Omitted from public scrutiny is the extensive inventory information developed by the Nature Conservancy under contract with BLM since 1981 and issued in a report entitled "Recommendations on the Old Growth Reserve System, 1986". BLM suppressed "Spotted Owl Surveys of BLM Selected Land, 1987" by R.J. Gutierrez, Dept of Wildlife, Humboldt State University (Cooperative Agreement No. CA-050-MA7-02). Absent a guiding Spotted Owl policy (RMP pg 1-4) and in light of significant new information on the Spotted Owl, BLM is required by NEPA to prepare a supplemental EIS "if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts (40 C.F.R. Sec 1502.9(c)(1)(ii)). The evidence indicates the decline of the Spotted Owl is related to loss of habitat and forest fragmentation (SYU 13 pg 3-22). This fragmentation, due to overdevelopment on private lands, is recognized as significant even in the RMP (pgs 3-1 through 3-5), but BLM refuses to protect the old-growth lands which may provide the crucial link between Spotted Owl populations and maintenance of genetic viability.

149-7

Although BLM admits further loss of old-growth habitat will result in death and decline of Spotted Owl populations (RMP pp 3-1 through 3-3), they provide no alternative to this blatant violation of the Migratory Bird Treaty Act (MBTA) and NEPA. The proposed action sets aside an inadequate amount of territory for only four breeding pairs of Spotted Owl, ignoring active sites and potential sites on the remaining public lands within the Arcata Resource Area.

149-8

BLM uses the issue of "uncertainty" as a key issue in their decision "to harvest (dispose for logging) or not harvest the remaining old-growth mature timber" (RMP pg 3-2; 3-8; etc.) BLM fails to consider the worst case possible extinction of old-growth dependent species such as "indicator species" like the Spotted Owl even though they admit knowledge of their decline due to loss of habitat, not just active breeding pairs (RMP 3-16). Even if no owls are present in the old-growth, logging will destroy increasing rare nest sites and feeding areas. (See attachments A-D) BLM is required to coordinate with other Federal and State agencies to gather significant new information relating to land use planning decisions, yet ignore an entire body of scientific data generated by planning processes in Oregon on Federal lands, which is significant and shows a high probability of accuracy. BLM has failed to carefully consider this new information, withholds it from the public, failing to even provide a summary of it or the pertinent inventories conducted on their own lands within the Arcata Resource Area. BLM is not in compliance with 40 C.F.R. Sec. 1502.22 (1986) regarding decisions based on "incomplete or unavailable information" BLM's failure to carefully present and review this significant information in the DEIS is in violation of NEPA and requires the preparation of a Supplemental EIS.

149-8

149-9

The RMP proposes to dispose of over 60% more public lands in the Arcata Resource Area without conclusive evidence that it serves the national interest (FLMPA Sec 102(a)). The disposal program gives top priority to a select group of private individuals and realtors through the BLM exchange base (RMP pg 1-9). BLM has illegally disposed of public lands within the Arcata Resource Area at under market value in violation of FLMPA Sec 203(d). The most blatant case is that of the Sanctuary Forest

149-10

where public old-growth lands were exchanged to a local realtor for \$200/acre; the public is now repurchasing former public lands from the private sector at 11 - 18 times the value paid to BLM. (See Attachment E) How many acres of old-growth forest lands were lost through this selective trading program? What impact has the active exchange program had on the allowable cut and commercial forest land base in SYU 13 since 1981? BLM has failed to evaluate the significant and cumulative impacts that the land exchanges have had on sensitive and endangered species throughout SYU 13.

149-11

A major resource objective considered in the RMP is the goal of improved manageability and proposed cost effectiveness through exchanges and consolidation of public lands (RMP pgs 1-5 and 1-9), yet BLM fails to provide conclusive evidence and postpones decisions until a later date when more site-specific evaluation is done. (RMP pgs iii; 2-3) Thus the public is at a total disadvantage at this time in evaluating just how much BLM is going to be improving management through this massive land giveaway. Problems and expense of managing the OGRs and scattered parcels are a major factor driving the RMP, but BLM provides no cost analysis of their implementation of SYU 13 since 1981.

149-12

The Forestry Program in the Arcata Resource Area: BLM's Hidden Agenda

BLM has failed to present accurate and understandable forestry statistics in the DEIS/RMP. They are poorly evaluated, scattered throughout the document making it difficult to evaluate and are based on unrealistic future projections. Through an active exchange program, which may in itself have noble goals, BLM has reduced their allowable cut from 8mmbf to 3.1mmbf (Forestry statistics chart provided to Lynn Ryan and conversations with Adrian Swenson at Ukiah office).

149-13

BLM continually refers to the future allowable cut based on intensive timber management in three areas (Red Mountain Vicinity, King Range Vicinity and Lacks Creek) with the phrase "if fully stocked" (RMP 3-15) and "when fully stocked" .(RMP pg 3-17) BLM never reveals the costs of returning the inadequately stocked lands to an acceptable level nor do they reveal the projection of 21 mmbf allowable cut calculation outlined in the December 1987 Northern California Vegetation Management Plan DEIS. This document called for extensive application of herbicides in order to meet allowable cut computations. (We are on record as opposing the vegetation management plans; please refer to comments submitted by EPIC on that document.) How does that document tier to this new RMP? The use of herbicides even as outlined in the SYU 13 parameters, is totally unacceptable. Manual release and thinning are required for proper all-age, sustainable forestry, to benefit the local economy through higher rates employment, and for public health and safety.

149-14

The economic factors are not justifiable. The ^{ANNUAL} allowable cut in the next decade of 3.1mmbf is hardly worth the effort to sustain a forest management program in the Arcata Resource Area (even in 1981 SYU 13 represented less than .6 of 1% of lumber and wood products employment for the region). Why wasn't an alternative developed that would have dropped the forestry program except to create a viable all-age, sustainable forestry program utilizing small scale, decentralized, community centered long-rotation methods? The approach taken by BLM is to try to institute industrialized forestry on scattered and isolated parcels -- like putting a round peg in a square hole. BLM ignores in the process the greater values and long term benefits to the public as well as to the various elements of the forestland resource that are recognized in FLMPA 43USC Sec. 1701(a) (7)-(8)

149-15

The Congress declares that it is the policy of the United States . . . that management [of the public lands] be on the basis of multiple use and sustained yield unless otherwise specified by law; [and] in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that where appropriate will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use

Other Factors of Sustainable Forestry Recognized in SYU 13 but Dropped From Consideration in the RMP

1. BLM fails to recognize the significance of the pioneer species on the "understocked" lands to the long term health and productivity of the forest (Ceanothus, for example, provides nitrogen). 149-16
2. The goals and intent of SYU 13 are lost in the projections for a higher allowable cut. (SYU 13 Fig 3-3, 4-1; pgs 4-12; 4-23; 4-24; 4-13; 4-25; 4-55; 4-40, 4-410) All references placed a high priority on research done by Franklin et al. confirming the significance of nutrient cycling, maintenance and recreation of old-growth components, maintenance of multi-layered canopy, genetic, floral and faunal diversity, retention of wildlife habitat and foraging sites, the significance of large logs for maintaining biological stability and conserving and recycling energy through the forest ecosystem. 149-17
3. BLM chooses NOT to consider soil and water quality issues in the RMP!!! These were the foundation of public concern and continue to be especially in areas undergoing extensive restoration such as Redwood Creek (RNP Protections Zone, Mattole River, The Wild and Scenic South Fork and Middle Fork of the Eel). Fisheries were given major consideration in the development of SYU 13 (pg 3-26). 149-18

How can BLM dispose of over 60% of the BLM lands many of which act as keystones, holding together the last bits of forest surrounded by developed private lands, without assessing the cumulative effects to the watersheds?

149-18

4. Respond to issues raised in the Attachments including the effects of the loss of our forests on the biosphere in the article from the New York Times "NASA Spots 'Greenhouse Effect'" by Philip Shabecoff, June 1988. (# F)
5. The RMP is replete with contradictions. on one hand BLM recognizes the rarity of the low elevation mixed evergreen forest but in the next paragraph rationalizes disposal of the last remnants because "Preservation of old-growth mixed evergreen ecosystem would ideally include large integrated natural systems such as entire watersheds." BLM does this even though they have recognized the value of the "islands" as important reservoirs in both the RMP (pg. 3-3) as well as in the early document SYU 13. "It is generally accepted that with today's timber management practices, the private lands surrounding these BLM managed islands will never again reach a seral stage compatible to old-growth dependant wildlife ..." (SYU 13 pg. 3-22). "Although a number of State and Federal parks occur within SYU 13... they do not fulfill the requirements for old-growth reserves on a regional basis." BLM fully recognizes the "insularization" of these natural habitats and the uniqueness of the ecotype but rationalizes disposal of, Gilham Butte, as one example (RMP pg. 3-18) based on it's proximity to HRSP and KRNCA (another contradiction inherent in this argument is that HRSP is a Redwood ecosystem supporting a different set of values. (See attachment H & I). Similar false arguments are made for dropping Halls Creek, Charlton/White Slide (RMP pg. 1-6).

149-19

Inconsistencies in the RMP

BLM's focus on the spotted owl in the RMP fails to capture the spirit of SYU 13 which offered mitigation for hundreds of species, outlined in mitigation sections (SYU 13 pgs. 2-24;2-25;2-28;2-29; 4-17;4-19; 4-41 to 4-57). BLM doesn't even allow for peregrine falcon which uses public lands for forage sites, dealing short shrift with 16,000 acres of proposed harvest in the Red Mountain Vicinity and disposal of public lands entirely within the Covelo Vicinity. It is misleading for BLM to call the alternative "Enhancement of Natural Values". (see attachments J & K concerning amphibious species dependant on old-growth as well as another rare bird not even mentioned in the RMP which needs coastal old-growth to nest).

149-20

Likewise the BLM devalues the significance of the rare and endangered plants found on the public lands, providing little consolation to the public concerned about the alarming loss of native plants. It is obvious that complete inventories have not been completed yet management decisions are being made which could result in irretrievable loss of species. One of the greatest contradictions is the BLM's recognition of the endangered plant, Menzie's wallflower and rare dune system along the Samoa Peninsula and the entirely unmanageable proposal to allow ORV use and a riding corridor. Another example is the sensitive Sargent Cypress in the Eden Creek area(RMP pg. 3-16) which is not recommended for wilderness designation by the BLM but is proposed for transfer to the USFS. The USFS has shown no indication that they will preserve the areas natural quality since the adjacent roadless area was left out of formal designation as wilderness. What will the consequences be for this sensitive species?

149-21

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149-23

Cultural inventories are not complete, yet again management decisions will irreversibly affect the resource. The public will not have access to the site specific / EA information unless they are

149-24

persistent and demand to be on the specialized list for "Notice of Realty Action" when the trades, sales and exchanges occur. I have asked to be notified of all exchanges in SYU 13, yet In-lieu selections in Covelo have occurred (RMP pg.4-14) already for which I have received no notification. My inquiry into the Bear Buttes parcel (which is still listed on the Scattered Tracts map as public land although it was already traded) resulted in the enclosed correspondence from the Area BLM office (Attachment L). The cost of the botanical and cultural inventories were so prohibitive as to stop me from further evaluation of the environmental impacts of this public lands trade. My request was made as a non-profit organization to supply the local concerned community with the information. This was a basic harassment I have experienced numerous times when I have tried to gather information from BLM on activity level plans. The significance of cultural resources in the Arcata resource Area is great as the Cahto Area exemplifies (RMP pg. 3-15) yet BLM denies their obligation to protect these resources with "no sites of known historic value have been identified". BLM must show an effort to do complete inventories of cultural resources before making such management decisions.

149-26

BLM devalues the visual and aesthetic aspects of the affected public lands. Impacts along Highway 101 are understated(RMPpg.3-14) since the area is slated for intensive logging. SYU 13 stated that BLM lands were easily recognizable due to their forested aspect (SYU 13 pg.3-21)

149-27

BLM provides an inadequate evaluation of the impacts of grazing on the lands within SYU 13. New information on the impacts of grazing should be evaluated particularly in light of the controversy of the loss of revenues from public lands due to a low AUM value. The Natural Resources Defense Council has proven that public lands are leased at a price which is \$5.35 per AUM under market value. In addition BLM can

149-28

no longer ignore the lack of significance that beef from public lands has to the overall market; especially in comparison to the amount of environmental degradation occurring. The Yokayo ROD is out of date and needs to be updated due to these considerations.

149-28

The RMP is difficult to read and evaluate. Several issues are not made clear to the public. For example, the withdrawals outlined on page 1-10 are not tied into any specific management areas that they may effect. The chart in Appendix 1-3 is equally unreadable. BLM doesn't fully explain the relationship of the State in-lieu entitlements (RMP pg.1-4) to the ELK HILLS lawsuit (RMP pg.3-4). Yet valuable forestlands in the Covelo Vicinity are already being traded to the State Indemnity Selection Program. If the in-lieu payments are dependent on the outcome of a lawsuit shouldn't there be a moratorium on disposal of lands in SYU 13 pending settlement???? If the Federal Government has owed these lands since Statehood -What is the hurry to pay them off now??? I feel this is significant because I see a resource tradeoff being made between the rare forests of Northern California (including committed OGRs and potential wilderness areas) and the desert lands in Southern California. Please respond to this fully.

149-29

149-30

BLM proposes to dispose of over 100,000 acres of sub-surface mineral rights without even outlining the procedure for such a massive effort. Who will be given the first right to purchase these rights, the owner of the surface rights or a select group of miners? The maps were much easier to read in SYU 13, there are inconsistencies apparent on the maps -parcels that were already traded are on the maps cycled for disposal.

149-31

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Direction for NATURAL AREAS PROGRAM as outlined in SYU 13

BLM should scrap this plan for intensive forest management in the Arcata Resource Area in favor of a sustainable- ecological forestry program based on principles long recognized by experts (see attachments M&N). BLM should develop a ~~type~~ "enhancement of natural values" alternative which would support their own philosophy on support of integrated natural areas(SYU 13 pg. 4-27 and RMP 3-3).

The area that BLM has failed to protect most blatantly outside of the OGRS and scattered old-growth values like TOM LONG CREEK; includes issues dropped from further consideration (RMP 1-5). The Cahto Coalition is promoting sound management in their effort to preserve the area surrounding the South fork Eel and adjacent to the unique Branscomb Reserve (RMP pg.3-14). The most sound land use planning for these areas is to create larger buffers through permanent protection of the rare resource values they hold. We support protection of the Cahto Peak, Brush Mountain and Elkhorn Ridge Areas (all were WSA inventory areas and two were OGRs in SYU 13 pg. 4-54). The Elkhorn Ridge timber sale should be withdrawn.

There is a need to enhance the area around Red Mountain as well. Congress will make the ultimate decision on the status of this WSA, so please explain how this RMP can make the ultimate designation of administrative designation for an ACEC. The impacts of an intensive timber management program and it's impacts to the struggling anadromous fisheries of the South Fork Eel have been totally ignored in this document!!!

149-32

Also suspect is the King Range Vicinity management area. BLM stated that the RMP was for lands outside the KRNCA yet ties the timber management in this vicinity to the existing timber program in

in the KRNCA (RMP pg. 2-51) "Lands contiguous to the National Conservation Area will be managed consistent with the "Zone" prescriptions which they abut. This involves Zones 2, 6, 7." this is contradictory, especially when read along with the Final EIS and Wilderness Recommendations for the King Range which prescribes timber programs within the WSA in Zone 2&7 and contains an appendix summarizing SYU 13 Timber Management parameters! How can BLM make these management decisions prematurely before Congress has made a determination of wilderness suitability- which could ultimately include areas of the King Range outside the WSA boundaries?? I thought that the timber program, as a result of legal action by the NRDC, was to be separate and distinct SYU 8 unit? Why are these being combined in this RMP? BLM also fails to reveal the impacts of intensive forest management and the use of herbicides on the salmonid population, undergoing restoration in cooperation with BLM, in the Bear Creek watershed. BLM once again ignores the opportunity to enhance this natural area, in this case an entire watershed, but instead prescribes an intensive management program (some activities in this drainage in the KRNCA have already damaged the natural quality- prescribed burns, for example). BLM fails to site reliable inventories for cultural resources (known to exist within the KRNCA bounds) as well as those of sensitive and endangered species (known to frequent Bear Creek vicinity).

149-33

Again Lacks Creek is cited for timber production, despite the fact that it lies within the Redwood National Park Protection Zone and could affect the massive restoration efforts to stabilize and restore Redwood Creek. BLM proposes to manage for timber resources in an already damaged watershed which is still being impacted by private timber companies who are ruthlessly removing the last remnants of forests from the adjacent lands. BLM doesn't consider the cumulative impacts to the watershed in their proposal to drop the Lacks Creek OGR from further protection.

149-34

/ 3

Other area deserving true protection of their natural values include Iaqua Buttes, which is surrounded by industrial forest land being logged illegally while the State Department of Forestry is challanged in court for violating California Environmental Quality Act and all the Scattered Tracts like Tom Long Creek which are significant reserves of old-growth or natural habitat for wildlife, act as keystones for the watersheds and genetic reservoirs and natural areas for continued health and productivity of surrounding lands (SYU 13 4-23 and 4-27).

BLM lands not found to have these significant values or those gained through exchanges that are understocked could then be evaluated for a small scale decentralized forest program which would be locally based and require high levels of employment. The principles of all-age ecological forestry outlined in the above referenced attachments would enhance and benefit the community as opposed to the intensive forestry model used by the present industry-which is presently devouring itself with rapid overcutting and will soon face a shortfall with economic disaster for the woodworking population. Logging our last bits of old-growth won't offset this inevitable disaster but BLM could be a model of truly sustainable forest management. We thought you were on the right track in 1981, how about starting over now with a new and visionary proposal?

14
END

Sincerely,
Cecilia Szym
E.P.I.C
7/18/88

RESPONSE TO COMMENT LETTER 149

- 149-1 Timber management whether intensive or otherwise is part of the multiple use spectrum as envisioned by FLPMA and defined by Section 102(a)(7).
- 149-2 The 'viability' of the basic timber management parameters outlined in SYU-13 Timber EIS and referenced on p. 1-7 of the DEIS are not significantly affected by the amount of timberland base being managed. Significant old-growth stands are being protected. See responses 417-11, 473-9, 520-6.
- 149-3 The DEIS contained two 'no timber harvest' alternatives; one in the Lacks Creek management area and the other in the Butte Creek management area.
- 149-4 Page 1-1 clearly states the purpose and need for the action being taken. Also refer to p. 1-4 to 1-12 of the FEIS.
- 149-5 Old-growth reserve candidates were proposed by SYU-13 Timber EIS to be studied and then designated through the land use planning process. The old-growth reserves that are being designated are listed on p. 1-4 of the FEIS. These areas will be removed from the timber production base and will not be part of the allowable cut computation.
- 149-6 The BLM has not disposed of any officially designated 'old-growth reserve' or RNA/ACEC. The FEIS proposes to preserve five significant old-growth reserve areas. See p. 1-4, FEIS.
- 149-7 Impacts of timber harvest and land disposal on old-growth values is discussed in Chapter 4, FEIS. See responses 165-8, 405-11, 417-11, 478-8, 520-5 on use of old-growth inventories and the designation of significant old-growth reserve areas.
- 149-8 Five significant old-growth reserves are being set aside for protection of intrinsic old-growth values and to provide habitat for six known pair of spotted owls and one individual owl. See response 149-7, 445-1.
- 149-9 See p. 3-3 of FEIS which references a spotted owl co-op agreement being entered into by the BLM and other resource agencies. Spotted owl and old-growth inventory information can be found in the analysis of the management situation (1986). See response 165-3.
- 149-10 See responses 520-5 and 568-7.
- 149-11 See response 568-11. Cumulative impacts of proposed management actions including disposal of Federal lands are discussed in Chapter 4. Also see response 481-5.

- 149-12 Improved manageability and cost effectiveness are mostly based on consolidation of Federal ownership and the acquisition of public access. No other 'hidden cost or agendas' are implied.
- 149-13 The text has been changed in the FEIS to include a Forestry Statistics Table 3-2, p. 3-21 to help the reader evaluate the numerous figures associated with the forest management section.
- 149-14 The cost of returning understocked commercial forest land to an adequately stock condition is addressed in the analysis of the management situation (AMS, 1986) and summarized in the Affected Environment Section, Chapter 3 of DEIS.
- 149-15 The 3 MMBF allowable cut estimated for the short term sustainable harvest does not reflect the production of a fully stocked forest land base that will be increased through acquiring high site forest land in the Lacks Creek, Red Mountain and King Range Vicinity management areas. This long term forest management program sustains a certain level of significant timber harvest while protecting natural and other multiple use values. Also see response 517-2.
- 149-16 Site specific analysis of restocking of under stocked lands and techniques to consider will be address with individual environmental assessment.
- 149-17 See response 517-2, 405-1, 405-3.
- 149-18 See response 517-7 on water quality concerns. Refer to comment 520-5 and 568-7 on disposal of BLM tracts. The cumulative impacts section has been expanded in the FEIS (Chapter 4) to include region wide effects of the management proposals.
- 149-19 See response 149-7,8.
- 149-20 See response 520-3.
- 149-21 See response 568-11, 306-5.
- 149-22 See response 520-1, 480-1.
- 149-23 The USFS's multiple use mandate allows them to manage for natural values, outside of actual wilderness designation. If lands are transferred to the USFS, sensitive species and natural values in the Eden Valley area will be considered and protection afforded accordingly.
- 149-24 See response 417-8.

- 149-26 See response 405-7. See responses 306-5, 417-8, 568-11 on plant and animal clearances.
- 149-27 Visual Resource Management (VRM) concerns as related to certain management actions are addressed on p. 1-11.
- 149-28 See response 520-8.
- 149-29 The text has been changed to reflect recent changes involved with the National Wildlife Federation Suit. Appendix 1-3 has been deleted from the FEIS text.
- 149-30 The reference to Elks Hills lawsuit was made to illustrate the magnitude of the value of the state entitlement and has no bearing on the state in-lieu entitlement process. See response 473-4 on present situation involving state in-lieu selections.
- 149-31 See response 473-11 on subsurface mineral rights. See response 405-7 on map corrections.
- 149-32 The designation of Red Mountain as an RNA/ACEC was recommended by existing land use plans and does not conflict with WSA interim management guidelines or Congress' ultimate decision to designate the area for permanent wilderness status. See response 481-5 for timber harvest impacts and the South Fork of the Eel River.
- 149-33 The statement that "lands contiguous to the KRNCA will be managed consistent with the 'zone' prescriptions..." implies that the management prescriptions in the King Range Vicinity Management Area should not invalidate existing management plans and the direction they provide. The statement does not intend to combine SYU's 8 and 13 Forest Management Plans nor does it intend to supercede the determination of wilderness suitability for the King Range WSA.
- 149-34 Specific actions within the Redwood Park Protection Zone in the Lacks Creek management area will be fully coordinated with the Redwood National Park and a site specific environmental assessment (EA) completed. See FEIS, p. 2-32, 3-10. By employing the basic SYU-13 timber harvest parameters and silvicultural guidelines, Appendix 2-1 and any specific mitigation measures identified by the EA and Watershed Activity Plan (completed by 1991), downstream resources will be protected. See response 417-12 on old-growth designation in the Lacks Creek area.

re: mtg. w/ J. Decker
Douglas fir old growth
Arcata Resource Area

Bureau of Land Management
Ukiah District Office
555 Leslie Street
Ukiah, California 95482
Attn: Mr. Al Wright

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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Cahto Coalition
Post Office Box 151
Leggett, California 95455
July 6, 1988

ARA-151

To administrative personnel,

With reference to the Draft Environmental Impact Statement, Arcata Planning Area Resource Management Plan, Chapter 1, pages 1-5 and 1-6 it is brought to your attention that the reasons therein to the public for not analyzing issue number one, Wilderness Designation of the Cahto Peak, Brush Mountain, and Elkhorn Ridge Units, are in need of clarification and correction in statement of facts of the Administrative Record of the period of time from 1978 to the present.

151-1

For the purpose of public review of the Arcata RMP, DEIS it is misleading to the public that BLM has referred to these Units as WSA's (Wilderness Study Areas). These Units were never given the WSA status and the failure to designate them as such in the Intensive Inventory for Wilderness of BLM lands outside the Desert Conservation Area gave cause for administrative protest and the appeal, IRLA 80-852.

151-2

In "original inventory determinations" there is a distinction to be made between the Initial Phase and Final Phase summaries of comments published in separate documents for each Phase. Due to public comments by persons familiar with the subject area a re-examination by BLM between these Phases resulted in Final Intensive Inventory determinations that the undeveloped public land within proposed WSA boundaries retains its primeval character and influence, has been affected primarily by the forces of nature and the imprint of man's work is substantially unnoticeable. Previous logging in Surveyors Canyon was noted within this discussion at that time and should not be used currently as a detrimental factor attempting to change the administrative record. (Final Intensive Inventory pp. 162, 163, 164)

151-3

To state in the Arcata RMP, DEIS that Opportunities for SPUR determinations are still valid is incorrect. The negative determinations made at that time in W. Inventory were based not upon logging impacts (substantially unnoticeable) but rather they were based upon size and shape of separate Units, private ownership patterns, freedom of movement and the ability of humans to disperse. For Cahto Peak, BLM cited permanent improvements and alterations outside the 5,871 acre boundaries as limiting factors to Op. for SPUR in the proposed WSA.

151-4

Due to the BLM acquisitions in the South Fork of the Eel River Corridor the bases for negative determination, i.e. size, shape, ownership and human dispersal, have changed. It is deceiving to the public to continue the separate numbering of Units CA-050-134 and CA-050-135 and isolating the River Corridor as a separate Unit of public land. Elkhorn Ridge, the wild segment of State and Federal Wild and Scenic River and Brush Mountain are now consolidated into a large integrated natural system of 10,000 plus acres with 900 acres of private inholdings which are also proposed for acquisition in the Arcata RMP.

151-5

In Final Intensive Inventory, p. 164 it is stated to the public, "If private lands between units CA-050-134 and CA-050-135 ever become public land, BLM will study the area using current land use planning processes and wilderness will be one of the uses studied at that time." The Arcata RMP EIS is the first land use planning process to be offered to include formal public input since publishing of the above statement and from the time of the major acquisition of the Wild and Scenic River Corridor.

151-6

In Arcata RMP, DEIS p. 1-6, the ELM reasoning that the acquisitions along the South Fork of the Eel River corridor are lands previously logged and therefore, implying to the public that Wilderness suitability is impaired and inappropriate is a broad statement which is inconsistent and inconsiderate to the fact that portions of the river (7 miles) in the Coato, Elkhorn, Brush area are specifically categorized as 'Wild'. Even if further information shows that these portions of the river are classed as 'Scenic' both of these categories are "free of impoundments, essentially primitive or largely primitive, inaccessible or largely undeveloped." Our familiarity with the area and mapping in the EIS for ~~Public~~ National Wild and Scenic Rivers System clearly indicates that this portion of the South Fork of the Eel River is not readily accessible by road or railroad, there is no development along the shorelines and there has been no impoundment or diversion.

151-7

It is very well known in the Leggett and Laytonville area that this portion of the South Fork of the Eel River is the most down-stream beginning of spawning grounds for anadromous fish. The kayaking use is considered the most difficult. The portions not visible from the Highway 101 Scenic Vista Point are essentially rock-walled canyons. The mountain slopes on both sides are in excess of 70% slope.

The acquisition of this Wild and Scenic River land was accomplished by the public-land disposal of Douglas fir old growth to the commercial timber owner who immediately logged the public disposed resource. Therein was a significant contribution to the reduced availability of timber from public lands. Current proposal, although hidden from public review in an Environmental Assessment and purported to be an alternative called "Enhancement of Natural Values" in the Arcata RMP DEIS, is to manage this area for timber production. This decision is being made at the expense of and irretrievable and irreversible loss of Wilderness Resource confirmed to exist in this area in the administrative record. This is a major Federal Action which requires not Environmental Assessment but full Environmental Impact Statement and public review. A RMP DEIS serves as such.

151-8

The value of Old growth Douglas fir has increased greatly over the past eight years. In SYU 13, p. 4-54 it is stated that, "A major rationale for selecting (Brush Mountain) and Elkhorn Ridge (for inclusion in a system of Old Growth Reserves) is that their inclusion in the (Northern California Coast Range) Preserve would result in a forest of meaningful size. Providing a large reserve would help assure the retention of numerous wildlife species. The North Coast Preserve is highly significant in preserving natural habitats and attendant wildlife species in Northwestern California and will assure greater importance in the future."

151-9

We respectfully request that the timber sale on Elkhorn Ridge be reconsidered as is required under Section 2(a)(ii) of the National Wild and Scenic Rivers Act. In the Arcata RMP EIS should appear for full public review an analysis of the effects of designating or not designating The Coato Area as Wilderness. The expected delays encountered in publishing the Final EIS for the Arcata RMP should not allow any further action within the current Red Mountain MFP which would impair the already established Wilderness suitability of this area especially with respect to the heretofore publicly unknown plans for timber management on the Wild and Scenic South Fork of the Eel River.

IN KNOWN SPOTTED OWL HABITAT

The substantial public comment which was received by the Interior Board of Land Appeals relating to IHLA 80-852 should be requested by the Ukiah District Office of ELM to be included with public comment in the Arcata RMP EIS. The rationale which was used by the applicant, The Nature Conservancy, for the United Nations designation of the Elder Creek watershed and its environs as a Man In The Biosphere Reserve should be revealed to the public in order that the public may properly assess the importance of this area in its natural state. This information is forthcoming and will be submitted to ELM even if it is not in our hands before the close of public comment period.

As there has been Nationwide cooperation and locally for more than 27 years with the Nature Conservancy

and Bureau of Land Management and whereas consultation continues with The Nature Conservancy's California Land Steward and Manageability of Public Lands will consider the willingness of organizations and creative partnerships (Arcata RMP DEIS, p. 1-8 sec. 10 d & e) that California BLM will discontinue its consistent practice in Wilderness Inventory and in the Arcata RMP DEIS of omitting from descriptions and maps the integral presence of The Nature Conservancy's ownership in the Cahto Area.

151-10

With regard to the State indemnity and selection process being made by the California State Lands Commission for Federal Lands we request that the Arcata RMP EIS consider how Federal Funding rather than Federal Lands containing Douglas fir old growth disposal might satisfy this debt. There is presented by Ukiah District BLM administrators that there is a helplessness and hopelessness of allowing anything other than such disposals to take place. In accordance with Arcata RMP DEIS p. 1-8, section 11, the Ukiah District should inform the BLM State Director of the importance of the overall 22,000 acres in this area (combined public and Nature Conservancy) for scientific research and insight into the workings of natural systems. Proper consideration of these values and inclusion of this area for consideration by U.S. Congress for inclusion in the Wilderness Preservation System should be a viable protective measure to be taken at this time.

151-11

During the meeting with Jim Decker and on another occasion recently, he has made casual reference to the participation of Cahto Coalition and The Nature Conservancy with BLM representatives in the decision making process which lead to the timber sale on Elkhorn Ridge. It has been implied that both organizations gave their approval of such action and in the context of this allegation it has been difficult for Cahto Coalition members to place the occurrence of any series of participation referred to.

We believe the reference is to a single meeting held in Branscomb with Mr. Tom Schott and Mr. Jack Lahr. (Mr. Decker had stated that Mr. Ed Katlas was involved) If our memory serves us correctly, this the meeting in which Mr. Lahr strongly set forth his opinion that, "We (BLM) are not the Park Service." The groups and individuals who are concerned about preservation of sensitive, threatened and endangered species and habitats were simply told in this meeting that the timber sale would take place and no mechanism for public input to this decision was offered at the time.

The reaction of The Nature Conservancy was to not allow access through their property as was being sought by BLM for the export of timber from the Elkhorn Ridge vicinity. The managers of the Northern California Coast Range Preserve, Katherine and Cameron Barrows, were at this same time presenting a proposal for special protection for a nesting site of Spotted owls confirmed to be present in the Southern portion of the Elkhorn Ridge Unit where the timber sale has now been made. The protection zone proposal was formally presented at the last meeting of the Ukiah District Citizen Advisory Council which was disbanded in the reorganization and combining of the Ukiah and Redding Districts.

The reaction of the Cahto Coalition to the announced timber sale was to wait for the normal administrative process to begin and to voice our objections not at random but within the anticipated process. Cahto Coalition, Redwood Chapter Sierra Club (Guenther) and Environmental Protection & Information Center (Southern) and individuals filled out the computer information notice cards offered by BLM and felt secure that BLM's offer in this format would be carried out. None of the above named groups or individuals received such offered notice. It is only in the recent Workshop Series that we know of the sale.

By Mr. Decker's recent reference to our participation we feel that it may be inferred at the present time that we are in some form or another of renegeing. We hope that the above recount will clarify for you a portion of past events since 1980-81 that lead to our current dissatisfaction and disappointment with the planning activity of and within the Red Mountain Management Framework Plan.

Thank you for sending Mr. Decker as your representative to meet with the representative persons of the Douglas fir old-growth areas left in the region of ELM's Arcata Resource Area. The fragmented forest of lower elevation mixed evergreen conifers and hardwoods has remaining remnants of varying sized intact systems. Pacific Lumber representatives have recently expressed that there is enough old-growth in public ownership to guarantee survival of wild life species dependant on old-growth forests. Mendocino County's forest advisor has alerted the public that there is not a sustainable cut on corporate lands. We hope you can foresee the head-on collision of these two arguments, consider the value relative to crucial habitats (policy statement, app. 2-4, A. RMP DEIS) that the lands in your jurisdiction have, weigh the six-tenths of one percent contribution to the single resource, timber (SYU 13 Timber Mgt. EIS), and seriously contemplate a change in the major thrust of management that has been carried out by Arcata Area Managers, Jack Lahr and John Llyod.

The remnant areas of intact ecosystems being of varying sizes will be represented as candidates for varying types of protective designations. On the smaller scale will be the Tom Long Watershed Association in which the ELM acreage is 400 and the local active constituency is strong and willing for 'Alternative management schemes' (A.RMP DEIS, p. 1-8, 10-4). Of the medium range is the Gilham Butte which has been threatened by the management thrust but which has a very strong and responsible constituency of persons who will apparently succeed in securing for this area protective designations ranging through Wilderness (Sec. 202), ACEC?/RNA (durability @ State In-Lieu Selection), or the special Ukiah District System of Old-Growth Reserves. In cross referencing the candidate areas named for this system in SYU-13, other areas actually studied by Barrows and cancelling the areas which qualified but have been disposed of by ELM (legality questionable) we inconclusively summarize that there are between twenty and twenty-six areas of intact old-growth which should be considered for this proposed District Reserve System. If the Barrows/Nature Conservancy Study did not include some areas it should not be concluded by ELM that same areas should be excluded. For example, the Elkhorn Ridge and Brush Mountain Units are listed as candidates in SYU-13 but were not studied by Barrows even though they are adjacent to the Northern California Coast Range Preserve.

151-12

In addition to obvious and typical time and cost restraints of such a study, the Elkhorn and Brush Units were at the time under Interim Protective Management because of DELA-80-852 and possible consideration for protective status superior to that to be offered by the District O.G. Reserve System. By other example, Charlton Creek/White Slide, Jewett Rock, Hulls Creek, et.al. should not be dropped from further consideration simply because they were not in the Barrows Study, other team study access problems or because some areas in the region have protective designations.

151-13

We wish to shift the burden of proof in these matters. If there is a change in the management thrust away from the single resource of timber, it would be fitting to allow intact old-growth systems (of varying sizes and increasing crucial value) to exist where they exist unless and until there is proof that they do not provide value for the ELM's furtherance of the purposes of the Endangered Species Act, Wild and Scenic Rivers Act and the multiple resource values that exist in undeveloped Federal Lands.

151-14

As the Cahto Coalition continues to seek Congressional protection by Wilderness Designation for the 22,000 acre Cahto Area (17,000 acres public) our efforts and possible failure should not preclude this area's consideration for protective designations of lesser strength. Evidence of this possibility exists in the omission of the Elkhorn and Brush Mountain from the U.S. Government Memorandum dated June 5, 1981, Yull, Julius, Whitmarsh. The thrust of our effort remains to be for Wilderness primarily due to the threat of the State of California State Lands Commission In Lieu Selections process. All of the effort being put into other protective designations if successful, may not hold up to this upcoming process. Ukiah District has not recommended as suitable ANY areas for Wilderness in the Arcata Area. As Mr. Decker has confirmed for us the magnitude of the selection process and that the line can be drawn only at Wilderness or WSA IMP, we respectfully request that you consider the legality of our arguments for immediate WSA status. We hope that our presentation does not appear combative but rather it will be helpful to you in realizing that you can make this decision now and it will constitute not a significant reversal but an action within the realm of Public Law.

151-15

We are looking forward to further discussions with you beyond the close of Public Comment Period for the Arcata RMP DEIS in the format of the committee which met with Mr. Decker today or we would be glad to meet with you in the Ukiah Office to discuss details of the Cahto Area if need be as a separate matter.

We would appreciate your response to the above matters as soon as you have time. In any case, please include this letter in the public comment for the Final EIS, Arcata Resource Management Plan.

Sincerely,

S.

S. Day for Cahto Coalition

RESPONSE TO COMMENT LETTER 151

- 151-1 Based on continued public comment, the acquired lands along the S.F. Eel River were reviewed for wilderness characteristics in association with lands previously evaluated in Elkhorn Ridge and Brush Mountain. Please refer to P. 1-6 of the FEIS.
- 151-2 The term "Wilderness Study Area" did not apply to these areas, as you have pointed out. This has been corrected in the final EIS.
- 151-3 The reference to Surveyors Canyon has been deleted from the text, see p. 1-6 of the FEIS. However, again refer to 517-4, 473-7.
- 151-4 See response 473-7.
- 151-5 See response 517-4.
- 151-6 The first land use planning process to occur after the Final Wilderness Inventory was completed was the Red Mountain/Scattered Tracts MFP, 1981. This plan recommended acquisition of lands in the South Fork of the Eel River to consolidate Elkhorn and Brush Mountain units for multiple use management and not for further wilderness study. Also see response 151-1 above.
- 151-7 See response 473-8.
- 151-8 The range of alternatives being developed for management of the Red Mountain Planning Unit, including 'Enhancement of Natural Values' Alternative are being analyzed through a full EIS with extensive public review.
- 151-9 The BLM has 'set-aside' over 3,000 acres in the Elder Creek Watershed and designated the area an ACEC. This ACEC is adjacent to TNC lands and since 1981 has been cooperatively managed by the TNC and BLM as the Northern California Coast Range Preserve (NCCRP). Since 1981, no other addition to the preserve boundaries has been recommended by the Bureau's Land Use Planning System. This RMP recommends adding 80 acres to the NCCRP ACEC.
- 151-10 The maps accompanying the DEIS are intended to show only Federal land or mineral interest in which management decisions are being made. Numerous maps exist that show the presence of TNC ownership as it relates to BLM ownership in the Cahto area and are available for public review.
- 151-11 Although the State Lands Commission has expressed their intent not to acquire land which is being retained by the Federal government for management of environmental resources (cultural values, sensitive habitats, etc.), it would not be in the public's interest to 'red flag' areas for natural concerns just to protect them from in-lieu selection.
- 151-12 See response 405-11, 417-11, 442-3, 520-6, 473-9.

- 151-13 The fact that the Elkhorn Ridge/Brush Mountain units were being inventoried for wilderness had no bearing on their consideration for old-growth reserve status as outlined in the SYU-13 Timber EIS. See response 405-11 for consideration of other old-growth reserve candidates.
- 151-14 The inventory and study process you desire has been done and the results are contained in the FEIS.
- 151-15 See response 473-7, 517-4,5 on consideration of the Cahto area for wilderness values. The list that accompanied the June 5, 1981 memorandum was the 'first cut' of the old-growth reserve system proposal. Simply stated, Elkhorn/Brush Mountain area did not have sufficient wilderness values to be designated a WSA in 1979-80 and it did not have sufficient old-growth values to be included in the Old-Growth Reserve System in 1981.

by Jan and Linda Derksen
for the Environmental Protection and Information Center
P.O. Box 397, Garberville CA 95440

June 22, 1988

This report addresses the Draft Arcata Resource Management Plan and Environmental Impact Statement (Draft RMP) as it pertains to Gilham Butte and the Old Growth Reserve System.

The Draft RMP and its management recommendations are flawed because of faulty methodology and omission of research data. In addition the Draft RMP is wrong when it abolishes the Old Growth Reserve System and emphasizes timber production at the expense of increasingly rare old-growth wildlife habitat. Also the Draft RMP does not address the critical issue of cumulative impact in recommending disposal of almost all of the candidate units for the Old Growth Reserve System.

165-1

Our report addresses the significant weaknesses of the Draft RMP and points out the strengths that Gilham Butte has that were overlooked by the Draft RMP. Briefly, the weaknesses can be summarized as follows:

1. BLM uses unscientific and arbitrary criteria for establishing the value of old-growth reserve units.
2. BLM suppresses public knowledge of the research report evaluating the old-growth reserve units.
3. BLM uses distorted summaries of research data to support recommendations in the Draft RMP.

A complete version of our conclusions and recommendations appears at the end of this report. In summary, they are as follows:

- o Revise the Draft RMP
- o Adopt the "No Action" alternative for Gilham Butte
- o Declare Gilham Butte as an Area of Critical Environmental Concern
- o Make Gilham Butte part of the Old Growth Reserve System
- o Maintain Gilham Butte with no trails, no hunting, and no campsites in order to reduce fire danger

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I. REASONS FOR RETAINING GILHAM BUTTE AS AN OLD GROWTH RESERVE

The strengths of Gilham Butte can be summarized as follows:

1. Gilham Butte has the greatest density (31 trees per acre) and number of big (> 36" diameter, averaging 50" diameter), old (> 200 years) trees in the proposed old-growth reserve system.
2. Gilham Butte's proposed reserve size of 1,320 acres makes it an excellent old-growth reserve area according to BLM standards of 300+ acres. Purchase of an additional 800 acres, as recommended in the No Action Alternative, would make it even more ideal. In order to maximize the possibilities for replacement forests, BLM should retain all acreage it currently possesses in the Gilham Butte area.
3. Gilham Butte consists of an large, integral unit of land along the ridge of Gilham Butte, containing headwaters for the Mattole drainage and the South Fork of the Eel River drainage. Its shape is compact and contiguous; lands are not scattered. Therefore its shape is excellent.
4. Gilham Butte has a strategic location as a dispersal island for old-growth wildlife dependent species because it is near Douglas fir and redwood old-growth areas in the King Range.
5. Because Gilham Butte is located so close to the Redwoods State Park, BLM might be able to work with State Park authorities in creating and maintaining valuable corridors and replacement forests right next to Gilham Butte on public parklands. Additional purchase of 800 acres of old-growth land from Eel River Sawmills between Gilham Butte and the park is essential in setting up these corridors and replacement forests.
6. Gilham Butte, which contains valuable old-growth Douglas fir forests, does not duplicate the flora genetic function served by Redwoods State Park because the Park contains old-growth redwood forests and does not contain any old-growth Douglas fir forests.
7. Gilham Butte is not valuable as land for timber production because the soils are fragile (according to TPCC maps), the slopes are steep (see attached letter from geologist W. Eastwood), and special timber harvesting techniques must be employed. In addition, half of the Doug-fir trees are at least 1/3 full of conks which destroy merchantable timber.
8. Valuable stream rehabilitation work performed by the State of California CALFIP program depends upon the watersheds in Gilham Butte. If Gilham Butte is logged, landslides would ruin the stream rehabilitation work that has

been completed.

9. Surrounding communities of people depend upon the Gilham Butte watersheds for their water supplies. Landslides from logging will hurt the Gilham Butte watersheds and endanger local water supplies.

10. Gilham Butte is valuable as an old-growth habitat for wildlife because it contains "indicator" species such as the pileated woodpecker, hermit thrush, goshawk (observed by local resident J. Monschke), red tree vole, and spotted owl. Further inventories might discover more spotted owls and additional species such as the Olympic salamander, the Marbled Murrelet, red-backed vole, and the tailed frog.

11. Gilham Butte is ideally suited for protection of old-growth dependent wildlife because it has perennial water, many topographical benches, and hardwood trees that provide food.

12. Gilham Butte is rich with wildlife, with sightings over the years by local residents that include the Golden Eagle, mountain lion, and black bear.

13. Gilham Butte is uniquely suited for studies of stand dynamics and fire history for the Douglas-fir/mixed evergreen forest type.

14. Gilham Butte is easy to protect from fire danger because it has no roads, trails, or campsites that correlate with increased fire danger. In addition, Gilham Butte has two accesses (Panther Gap and Salmon Creek) for fire fighting vehicles. Gilham Butte's location along a ridge top increases the ease of aerial fire fighting. Gilham Butte's high profile on the horizon increases early fire detection by people in surrounding communities. Most of the old-growth stands are on the northern and eastern slopes of Gilham Butte. Because fire danger is less on northern and eastern aspects, Gilham Butte's old growth forests are thus advantageously situated.

15. Because it has so many stands of mature and old-growth Douglas-fir, it is ideally suited for wildlife population studies in a chronosequence of different aged stands from young to mature to old-growth.

16. Gilham Butte's boundaries with meadows and hardwood forests enhance its ability to support genetic diversity for many species of wildlife.

17. Using criteria commonly accepted by reputable researchers, Gilham Butte ranks very highly as an old-growth area that should be preserved.

II. BLM SUPPRESSES A SIGNIFICANT 1986 STUDY OF THE PROPOSED OLD-GROWTH RESERVE SYSTEM

In preparing the Draft RMP, BLM used data from a 1986 study of the old-growth reserve system proposed for SYU-13. This study is the 1986 OLD-GROWTH RESERVE SYSTEM DOCUMENTATION FOR THE ARCATA RESOURCE MANAGEMENT PLAN (hereinafter referred to as the 1986 study).

The 1986 study was conducted "in response to instructions to further develop the proposal for an old-growth Douglas-fir reserve system in SYU 13." (6/5/81 internal BLM memo to Paul Yull, Tim Julius, Stan Whitmarsh)

165-2

The only official reference the Draft RMP makes to this 1986 study is in the Appendix as follows:

Inventory of the candidate old-growth reserves was accomplished by crews of the Nature Conservancy under cooperative agreement with the BLM. (p. A-1)

The 1986 study is more than just an inventory, however. It consists of several hundred pages with the following sections:

- o a report by BLM personnel regarding the value of preserving old-growth in SYU-13, the criteria involved in ranking the areas for old-growth reserve status, and a preliminary ranking of the candidate areas for old-growth reserve status;
- o two detailed inventories of the candidate areas (the first inventory was done in 1983; the second, in 1984);
- o extensive descriptions of the research methods used in the two inventories;
- o management recommendations for each of the candidate reserves;
- o management recommendations for protection of old-growth in SYU-13.

The Draft RMP never gives the name of the study or any information about how to obtain a copy of it. After using the 1986 study extensively in preparing the Draft RMP, BLM never directly refers to the study (except as noted above in the appendix) nor quotes from it.

The fact that the 1986 study is poorly published (no table of contents, no index, no consecutive page numbering, no appendices, no lists of personnel) and poorly publicized (no copies sent to public libraries, no notice of the publication given to the public, no references made in bibliographies) further supports our suspicion that BLM was unhappy with the 1986 study's conclusions and wanted to keep as quiet as possible about the 1986 study.

165-3

BLM needed to use data from the 1986 study but did not want to use the recommendations and conclusions presented in the study.

We conjecture that if BLM had openly referenced the 1986 study, then BLM would have had to make the 1986 study available to the public. People reading the Draft RMP would have wanted to read the 1986 study itself, and in so doing, they would have found out that the 1986 study's conclusions and recommendations were in direct contrast with those proposed by BLM in the Draft RMP.

165-3

We must call BLM up short on this omission: it is inexcusable for BLM to prevent the public from seeing the 1986 study, especially when the data are relevant to the massive changes BLM proposes in the Draft RMP.

III. THE DRAFT RMP USES QUESTIONABLE CRITERIA FOR DEFINING THE OLD-GROWTH SIGNIFICANCE OF RESERVE AREAS

The Draft RMP lists eight factors for rating candidate reserves for "old-growth significance" (p. A-1):

- (1) total number of vascular plant species;
- (2) total of old-growth associated animal species;
- (3) number of bird species as an indicator of diversity;
- (4) presence or absence of perennial water;
- (5) species composition and stand condition, such as age, defect, associations;
- (6) amount of woody debris and snags;
- (7) geographic continuity and manageability of the candidate reserve;
- (8) location -- significance as a "stepping stone" or tie with other known old-growth units, such as Forest Service SOMAs.

This list of criteria is an unusual one because it creates three factors that BLM has no research data for and eliminates two factors that BLM does have research data for. For comparison, we need to look at the criteria that BLM used in the past for establishing old-growth significance.

165-4

The first set of criteria was written down in a memo by BLM staff describing how the research should be done for the 1986 study. The criteria listed in this memo (6/5/81, To Paul Yull, Tim Julius, Stan Whitmarsh) are as follows:

- (1) Size: 300 acres +; the bigger, the better.

(2) Presence of water: length and size; intermittent vs. perennial.

(3) Stand condition: how well it approximates a classic old-growth model, i.e., dense, multilayered canopy; high level of standing and down dead woody material; large overstory trees of 200 years +. We gave emphasis to the conifer component in the mixed evergreen system found on most of the public land. The "purer" the stand, the higher it ranked. In some instances we added a few points for significant potential for producing old-growth characteristics.

We also gave weight to the presence of cooler, north and east aspects.

(4) Shape: best is compact, contiguous. Worst is scattered.

(5) Location: Proximity of similar supportive areas is good. But also, scarcity in a region is a factor. In practice we found the location factor not to be very useful. Almost all of the BLM blocks are the last remaining stands in heavily cut-over or nonforested country. We did attempt to spread the units of the system over the district to insure a fairly even distribution of the habitat type. We had to overlook the size criteria to get any units in the southwestern part of SYU 13. We also went a little under the size criteria for two northern units.

(6) Presence of indicator species: spotted owl, goshawk, pine marten, fisher, etc.

The next list of criteria we need to compare is the one used in the 1986 study done by Nature Conservancy under cooperative agreement with BLM:

1. SIZE. The total acreage for each proposed reserve is given, followed by the total acreage of old growth habitat. The latter figure includes only that part of the forest which contains large individual Douglas-firs (DBH greater than 36 inches, age greater than 200 years). It is important to recognize that the surrounding forest, usually mixed evergreen forest with tanoak as the dominant tree, also provides habitat and resources for wildlife species, though the acreage for these vegetation types is not included.

2. SHAPE. Large blocks where reserve boundaries coincide with natural boundaries (ridgetops, creeks) are judged better than linear blocks or irregular shapes with narrow corridors between them.

3. STAND QUALITY AND CONDITION. Comments relate to the extent and density of old growth stands, their average age (age of the larger trees in the stand), and the effects of disturbance, if any. Stands which occur in a narrow strip

along a creek are judged of lower quality than more extensive forest stands. Also included are comments on how representative old growth stands are of the "typical" condition for low elevation old growth Douglas-fir forests in the Coast Range.

4. STAND CONTINUITY. The configuration of old growth stands with respect to natural features (creeks, ridges) was evaluated. The relationship of adjacent stands within the same reserve unit was considered in this evaluation. Stands fragmented by logging along boundaries on adjacent lands were judged lower as were stands where old growth was patchy and discontinuous.

5. DEFENSIBILITY. The potential for impacts from trespass or activities on adjacent lands are considered. Units which encompass natural boundaries, such as ridges or whole watersheds, were rated as desirable. Access to the site is also considered.

6. OLD GROWTH ASSOCIATED SPECIES. The list of potential old growth associated species was taken from several sources, including Raphael (1981, 1982) and Meslow, et al. (1981). Other species may occur on each reserve; the lists include only those species which were directly observed. Further research is needed to confirm the degree of dependence of each of these species on old growth forests.

7. MANAGEMENT CONSIDERATIONS. Management recommendations and significant research questions for each area, previously outlined in the inventory reports, are included here.

We can see the similarity between the old-growth criteria described in the 1981 BLM memo and the criteria in the 1986 research report. The similarity exists because BLM set up the old-growth criteria for the 1986 study, and the Nature Conservancy-BLM crews followed these criteria in their protocol for the 1986 study.

One would naturally think that the Draft RMP recommendations would be based upon the 1986 research study data within the confines of the research protocol. Not so. In fact, the Draft RMP sets up three additional criteria that the 1986 study did not address except as incidental observations. Also, the Draft RMP simply ignores two very important criteria that were part of the 1986 study. And finally, although BLM includes several of the 1986 study criteria in the Draft RMP criteria list for establishing old-growth significance, the Draft RMP does not discuss any data that would lead to positive evaluations for the candidate reserves, except for Butte Creek.

165-5

We want to address each of these errors.

First, in the Draft RMP, the following factors suddenly appear for the first time as criteria for establishing old-growth significance. These factors do not appear in either of the other two lists and consequently were not part of the 1986 research study protocol. As a result, BLM

has only incidental observations but no hard research data for the following criteria:

- o total number of vascular plant species;
- o total of old-growth associated animal species;
- o number of bird species as an indicator of diversity;

Reputable researchers do not take into consideration the total number of vascular plant species, total of old-growth associated animal species, and number of bird species when deciding whether an area has old-growth value. What reputable researchers do is to sort out what flora and fauna species are common and can exist in a variety of habitats (i.e., regeneration forests, farmland, urban areas, etc.) and which flora and fauna are rare and thus require old-growth forests for habitat. Obviously, common vascular plant species and common bird species would add to the total number of species being counted, but such counts would not help at all in determining the old-growth significance of an reserve.

165-5

Many different definitions of old-growth occur in the literature, but none of them include the numbers of species of plants, animals, and birds as criteria. For example, the U.S. Forest Service does not include the above 3 factors in its well thought out list of old growth criteria (CALIFORNIA WILDLIFE/HABITAT RELATIONSHIPS PROGRAM, INTRODUCTION, p. 107):

1. large sized trees
2. old-aged trees
3. decadence of standing vegetation
4. much dead and down woody material
5. uneven-aged vegetation
6. multi-layered vegetation
7. moderate foliar height diversity
8. mesic (moist and cool) microhabitats; high canopy closure.

165-6

Furthermore, the Forest Service recommends defining old growth "in terms of any combination of these or other attributes, as delimited by the needs of the [wildlife] species that are to be managed for a particular area." (p. 109)

Usually researchers look for indicator wildlife species and then look to the elements of the habitat that these old-growth associated wildlife species depend upon.

These traditionally accepted research criteria differ sharply from those in the Draft RMP.

In contrast, the 1986 study criteria are in line with traditionally accepted criteria. The 1986 study does not look at the numbers of plant, animal or bird species when deciding whether an area has old-growth value or not. Consequently the 1986 study was not designed to

rank candidate old-growth reserve areas according to the numbers of plant, animal, and bird species.

Now we'll discuss the second error. The Draft RMP eliminates the following criteria which appeared in the other criteria lists from the 1981 BLM memo and the 1986 study:

- o size
- o presence of indicator species

To deal with this disparity in criteria, the Draft RMP dismissed the more conventionally accepted scientific criteria with the following comment:

"Old-growth is a very nebulous concept, and what constitutes an adequate indication of old-growth is not scientifically fixed. Therefore, a variety of data were collect by TNC [The Nature Conservancy] crews, not all of which were ultimately used [by BLM] for determining old-growth significance of the candidate reserves." (p. A-1)

In other words, BLM decided it didn't want to use certain data presented in the 1986 study. BLM ignores important research data and recommendations of the 1986 study by dismissing the 1986 study criteria and by creating its own arbitrary, unscientific hodge podge of criteria for old-growth.

165-7

Now we'll look at the third error. The Draft RMP includes important criteria in its ranking scheme but never discusses the data found for Gilham Butte regarding these criteria.

The following criteria appeared in the 1986 study and also in the Draft RMP in different wording and emphasis:

- o presence or absence of perennial water
- o species composition and stand condition, such as age, defect, associations
- o amount of woody debris and snags;
- o geographic continuity and manageability of the candidate reserve;
- o location -- significance as a "stepping stone" or tie with other known old-growth units, such as Forest Service SOMAs.

The Draft RMP does not point out that Gilham Butte does meet these criteria with admirable statistics. Gilham Butte has perennial water with several perennial streams. It has many old-growth areas with valuable old-growth hardwoods as well as Douglas fir. Gilham Butte has commendable levels of woody debris and snags. It has outstanding geographic continuity including bench topography, a ridge top of a watershed, and valuable northern, eastern, western, and southern

165-8

aspects all contributing to habitat diversity. And finally Gilham Butte is strategically located next to Humboldt Redwoods State Park and near Kings Range so that fledgling spotted owls can perhaps find their own new nesting areas without travelling too far, a journey that all too frequently has deadly consequences if nearby old-growth areas are not at hand.

The consequences of the error in the Draft RMP are dramatic: Gilham Butte and other candidate reserves rank low if the Draft RMP criteria are used and flattering data are omitted, whereas Gilham Butte and the candidate reserves rank high when 1986 study criteria are used and when all the data, including the flattering data, are discussed.

165-9

BLM would find it difficult to propose disposal of Gilham Butte if Gilham Butte had its proper high ranking.

IV. BLM DISTORTS DATA AND SUMMARIES FROM THE 1986 STUDY OF THE PROPOSED OLD-GROWTH RESERVE SYSTEM

BLM was in a dilemma. It needed the data from the 1986 study because those were the only data it had about the old-growth system. But BLM had its own preconceived set of recommendations and conclusions that the 1986 study data did not support. Thus, BLM had a difficult time writing the Draft RMP with these constraints.

The Draft RMP shows the stress of these constraints in its terse statements and fragmented style. Frequently BLM's only recourse is to make sweeping statements without giving any supporting data whatsoever. For example, take the following passage:

Three sites within this [Scattered Tracts] unit have previously been identified as old-growth reserve study areas. Gilham Butte and Big Bend are unsuitable for further protection. Iaqua Buttes was found to be suitable; however, because of its proximity to other old-growth areas, configuration, size, and access, management would be extremely difficult. (p. 2-87)

We find this an unscientific and unprofessional approach to decision making. The management recommendation should be an outcome of a careful reasoning process that is clearly based on premises and information contained in the Draft RMP. Otherwise, why not forget about the Draft RMP and publish the decision by itself?

Perhaps the reader is diligent enough to continue reading another 50 pages of the fragmented Draft RMP. If so, then a somewhat terse rationale appears. The passage, in its entirety, is the only place in the Draft RMP that states BLM's reasons for disposing of Gilham Butte:

Gilham Butte (1,320 acres) has 390 acres of old-growth timber, but has severely limited perennial water and has a low diversity of flora and fauna typically found on other candidate reserves. Also, the value of Gilham Butte as an old-growth dispersal "island" is diminished because of its proximity to the 50,000-acre Humboldt Redwoods State Park and the Honeydew drainage within the King Range National Conservation Area. These two areas have old-growth values. There are large stands of virgin Douglas-fir within the coastal zone of the King Range that have not yet been inventoried for old-growth and dependent species.

The foregoing passage is based on data that were taken out of context and misused. As mentioned previously in this report, the 1986 study didn't collect data that could be fairly compared concerning counts of flora and fauna diversity. However, it is good to go further into the argument at this point so we can see precisely what distortions occur.

We will contrast each phrase of the disposal rationale passage with actual research data from the 1986 study, information from other research studies, and with observations from local residents:

1. Disposal Rationale: "Gilham Butte (1,320 acres)". Actual Research Data: The BLM acreage recommended by the 1986 study for a reserve on Gilham Butte is 1,320 acres. However, if the No Action alternative is adopted, an additional 800 acres will be added to BLM's Gilham Butte holdings, thus making Gilham Butte a very substantial old-growth reserve. BLM should retain all the acreage it has on Gilham Butte (more than 1320 acres) in order to enhance opportunities for the forest replacement that is necessary in the future. This acreage will also provide a much needed buffer zone between the old-growth stands and the human communities that surround Gilham Butte.

2. Disposal Rationale: "390 acres of old-growth timber". Actual Research Data: There are at least 390 acres of old-growth timber on Gilham Butte.

But notice that the Draft RMP refers to "old-growth timber," not to "old-growth habitat." If you use criteria for establishing old-growth habitat instead of old-growth timber, there would be more acreage. The 1986 study estimated the amount of old-growth timber by studying aerial photographs of Gilham Butte and by conducting two inventories of the region. Much more study is necessary to determine how much more old-growth timber actually exists on Gilham Butte.

More important, however, is the fact that old-growth timber is not the only criteria for establishing old-growth habitat. The definition of old-growth habitat encompasses much more than having lots of big old trees, as one can see in the Forest Service's criteria list for old-growth designation. If more studies are done and better definitions of old-growth habitat are used, all the acres of Gilham Butte might properly be classified as supporting old-growth dependent species.

3. Disposal Rationale: Gilham Butte "has severely limited perennial water..." Actual Research Data: Gilham Butte does not have severely limited perennial water. Even in drought years Gilham Butte has perennial water from the Westlund, Gilham, and Salmon creeks. In addition, two Salmon Creek residents (Jan Derksen and Chip Tittman) discovered water in a large old-growth area on the ridge of Gilham Butte in the drought summer of 1988.

The 1986 study very clearly describes the water situation on Gilham Butte as follows:

PRESENCE OF WATER: Many small perennial tributaries of Westlund and Gilham Creeks. (1985 Management Recommendations Section: Gilham Butte)

In an earlier inventory the 1986 study shows the following table:

Table 8. Water sources associated with old-growth reserve units.

Gilham Butte	Grindstone Cr.	Intermittent
Gilham Butte	Gilham Cr.	Intermittent
Gilham Butte	Gilham Cr.	Intermittent
Gilham Butte	Westlund Cr.	Perennial

(1984 Inventory Section, p. 19)

4. Disposal Rationale: Gilham Butte has "a low diversity of flora and fauna when compared with other candidate reserves." Actual Research Data: Gilham Butte has great diversity of flora and fauna when compared with other candidate reserves.

Once again we must stress that diversity of flora and fauna is not a criterion that establishes old-growth significance. Credible researchers look for indicator species, not for diversity of species, to establish old-growth significance. One spotted owl is much more important in establishing old-growth significance than sightings of 30 song birds.

To state that Gilham Butte has a low diversity of flora and fauna, BLM has to distort the 1986 study's data as well as take them out of context. How BLM manipulates the data is now discussed.

To count the number of vascular plant and bird species, BLM uses lists of the species observed by crews in the 1986 study. However, these data were never collected with the intention that they be used for the unusual purpose of ranking candidate reserve areas by number of species sighted.

The 1986 study was designed to count numbers of species to show that indicator species were present in the old-growth reserve areas. The 1986 study was not designed to count numbers of species to rank the old-growth reserve units.

Consequently, the count of species is not adequate. For example, in the case of bird species the list was inadequate because of the following reasons described in the 1986 study:

Bird species occurring in the stands were recorded as they were observed, or heard singing, from each plot. At this time of year, many species have stopped singing so visual scans of the forest were made at each plot. Still, several species that probably occur in these areas were not recorded. (1986 study, 1983 inventory section, p. 8)

A complete list of all bird species recorded at each reserve is shown in Table 7. These observations are incidental and do not represent a systematic survey of bird populations. (1986 study, 1984 inventory section, p. 16)

We attempted to reconfirm the presence of this [male spotted] owl in 1983 and again in 1984 but were unsuccessful. In both cases the conditions for census of spotted owls, including high winds and temperatures greater than 100 degrees F., were unsuitable. ... A census should be conducted earlier in the year (April/May) to determine the status of these owls. (1986 study, 1984 inventory section, p. 38)

It has been noted by the National Forest Service that

Insofar as bird species diversity is associated with foliar height diversity, by managing for foliar height diversity, we can affect the level of bird species diversity. (CALIFORNIA

WILDLIFE HABITAT RELATIONSHIPS PROGRAM, INTRODUCTION, p. 108)

Consequently in the part of the Gilham Butte forest with the very big trees, there is very little understory and very little foliar height diversity, and consequently there will be very little bird species diversity.

Furthermore, with regard to counts of bird and plant species the 1986 study reports that

There are many large Douglas-fir at Gilham Butte, more than other locations we visited. ... The understory in these stands is open, contrasting sharply with the thick cover of shrubs and tanoak we encountered on most of our other plots. (1986 study, 1984 inventory section: Gilham Butte)

The 1986 study recommends completing "a thorough inventory of plant and animal species, preferably earlier in the year (spring), to confirm the presence of additional old growth associated species." (Introduction, p. 31) In addition the 1986 study contains the following disclaimer:

The herb layer in all areas featured a diverse array of species. We encountered 69 species of vascular plants including five ferns and 40 herbs (Table 3). Because our field work was done late in the season, many species were probably missed. (Introduction, p. 14)

Also, the 1986 study reports that Gilham Butte has the greatest "density of large Douglas-fir trees greater than 36 inches" of all the candidate reserves: 31 large trees per acre. In old growth areas with this kind of tree density and tree size, it is impossible for there to be much of an herbaceous layer. You can have lots of very big old trees and not much of an herb layer, or you can have fewer trees big trees and have a more diverse understory. You can't have it both ways at the same place.

To conduct the 1986 study, the crews attempted to find old-growth areas that contained "large individual Douglas-firs (DBH greater than 36 inches, age greater than 200 years)." On Gilham Butte, the crews were dramatically successful in finding many acres with these big old trees. Then, according to the following protocol, the crews conducted their flora and fauna studies in these areas:

Aerial photographs for each study area were examined to determine the extent of old growth Douglas-fir habitat. An initial plot was selected in representative stands in each area, and a transect was run along a compass direction chosen to stay within the bounds of the habitat type. ... Plot centers were set up every 100 m along the transect. A 0.1 acre circular plot was established at each center. ... All herbs within the plot were recorded by species. Many species were past flowering so were identified to genus only. (Introduction, pp. 5-6)

If the crews had studied the parts of Gilham Butte where there were fewer big trees, the crews would have found greater diversity of flora and fauna.

The Draft RMP does not give numbers of animal species for any of the candidate reserves. Since the 1986 study doesn't count up or list the animals observed, it's a mystery where BLM gets any data to support conclusions on this topic.

We're almost tempted to conclude that BLM used the "Summary of Spotted Owl Pellet Analysis" table in the 1986 study because it lists 10 kinds of animals that can be identified by bone and hair fragments in the owl pellets.

The 1986 study says

"Quantitative estimates of vertebrate species were not attempted in this study because of the short duration of field work at each site (3.5 - 4 days) and the difficulty of access, limiting transport of census equipment (i.e., mammal traps). Information on the presence or absence of wildlife species was recorded for each site. (1983 inventory section, p. 8)

In summary we emphasize that the 1986 study was conducted to confirm the presence of indicator species and was not designed to collect the greatest number of species for each candidate reserve. For the Draft RMP to rank candidate old-growth areas according to numbers of plant, animal and bird species is a distortion of the data and methodology used in the 1986 study.

5. Disposal Rationale: "The value of Gilham Butte as an old-growth dispersal island is diminished because of its proximity to the 50,000-acre Humboldt Redwoods State Park and the Honeydew drainage within the King Range National Conservation Area. These two areas have old-growth values." Actual Research Data: Gilham Butte's value as a dispersal island is unquestionable. Only the Draft RMP can distort geography enough to come up with its conclusions. According to Humboldt County Timber Maps and Redwood Park officials, there are no old growth Douglas-fir forests in Humboldt Redwoods State Park. They were logged years ago. The Draft RMP is correct in stating that the Park has "old-growth value," but the Draft RMP omits telling us that the old-growth in the Park is redwoods, not Douglas-fir. The two ecosystems are quite different with regards to flora. BLM must be faulted for either gross unprofessionalism in this regard or blatant misrepresentation. Comparing old-growth Doug-fir forests with old-growth redwood forests is like comparing apples and oranges.

Dispersal islands of old-growth work only when there are several of them close enough together for animal species to move between them. You need many old-growth islands, not just one or two. We hope that there are many such islands in the King Range and that the wildlife species in Gilham Butte can visit their cousins in the King Range Humboldt Redwoods State Park regularly.

6. Disposal Rationale: "There are large stands of virgin Douglas-fir within the coastal zone of the King Range that have not yet been inventoried for old-growth and dependent species." Actual Research Data: There is a great need for such an inventory. But we reject the implication that old-growth areas in the King Range would obviate the necessity of preserving old-growth areas at Gilham Butte. Gilham Butte should not be disposed of because possibly there might be other old-growth areas in the King Range. As the 1981 BLM memo points out, "the old-growth Douglas-fir community, a major ecosystem native to the region of SYU 13, is becoming scarce in northwestern California. Blocks large enough to sustain the major life components of the community are fast disappearing."

V. THE DRAFT RMP OMITS IMPORTANT RESEARCH DATA REGARDING THE VALUE OF GILHAM BUTTE

Although the Draft RMP lists species composition and stand condition, such as age, defect, associations, as one of the factors for evaluating old-growth reserve units, the Draft RMP does not comment on any of these factors as they might relate to Gilham Butte.

In contrast, the 1986 study enthusiastically documents all of these factors for Gilham Butte as follows:

Gilham Butte is large, with the most extensive stands of old-growth vegetation and representative diversity of associated vegetation types... Old growth stands are concentrated along drainages, the typical pattern for these low elevation areas of the Coast Range. Many large trees (50 to 70 inches diameter at breast height); stand age 200 to 300 years and greater. ... Provides very good example of old growth Douglas-fir forest in complex of typical vegetation of region -- mixed evergreen forest, chaparral, live oak woodland, and small grasslands.

The Draft RMP also lists amount of woody debris and snags as a factor in evaluating Gilham Butte, but does not comment upon this factor. The 1986 study relates that Gilham Butte has a snag density of 3.3 snags/acre and a downed log density of 1.7/acre. The average diameter for downed logs is 45.5", and the average length is 23.2 ft. The average diameter of snags is 42".

Regarding geographic continuity, another factor that the Draft RMP does not comment on for Gilham Butte, the 1986 study states, "Several stands are fairly large (50 acres and greater) and continuous from near ridgeline to boundary of reserve."

In conclusion the 1986 study states the following about Gilham Butte: "The large size, representativeness, and quality of old growth stands make this unit particularly valuable as habitat. If possible, acquisition or trades should be pursued to consolidate boundaries."

VI. COMMENTS ON THE OLD GROWTH RESERVE SYSTEM

On the issue of the Old Growth Reserve System as a whole, we need to emphasize that 300 acres of old-growth habitat is too small for spotted owls. Reputable, recent research indicates that 1200 acres is a minimum figure for spotted owl habitat. We call BLM up short on its attempt to reduce spotted owl habitat acreage because of incidental observations with no published study to document such a small figure as 300 acres.

165-10

All candidate areas for the Old Growth Reserve System should be free of roads, trails, and campsites because these facilities increase fire danger in very rare and valuable areas that frequently are difficult to defend by firefighters.

The Draft RMP does not print a list that ranks the candidate reserves according to BLM's flawed list of eight criteria for old-growth significance. Such a list would be ludicrous in scientific circles because both the criteria and the 1986 study data are inappropriate for such a list for the reasons discussed previously in this report.

We protest the BLM argument that rewriting the Draft RMP would be too expensive because it would cost \$200,000. Consider for a moment that only one tiny part of the acreage recommended for disposal in the Draft RMP is estimated by BLM personnel to be valued at \$3,000,000. That tiny piece, one of many scattered tracts that were so small that they didn't even deserve their own heading in the Draft RMP, is Gilham Butte.

VII. CONCLUSIONS AND RECOMMENDATIONS

Because the Draft RMP's preferred alternative for disposal of Gilham Butte is based on suppression and distortion of research data, and on unprofessional and unscientific methodology, we make the following recommendations:

1. The Draft RMP and its recommendations for the old-growth reserve system should be extensively revised or completely rewritten because they are flawed scientifically. The revised Draft RMP should be based on accurate assessments of research data and input from the public.
2. BLM should recommend a "No Action" alternative rather than the current Administrative Adjustments alternative for Gilham Butte.
3. Gilham Butte should be declared an Area of Critical Environmental Concern.
4. Gilham Butte should be part of the Old-Growth Reserve System for the Arcata Planning Area.

5. The Old Growth Reserve System, including Gilham Butte, should not have trails, roads, hunting, or campsites because they all dramatically increase fire danger.

6. BLM should keep the Old Growth Reserve System and adopt the conclusions outlined in the Old Growth Forest Reserve System Management Recommendations section of the 1986 study.

7. BLM should adopt 1200 acres of old growth as minimum spotted owl habitat requirement instead of 300 acres.

8. BLM should never use any pesticides or herbicides in any of the Old Growth Reserve Units for any reason whatsoever. Except for fire protection, the units should be left unaltered by humans so we have them as living laboratories for as many varying kinds of sites and habitats as possible.

9. BLM should make a significant, concerted effort to preserve all old-growth acreage in its possession. With only 5% left of the original forests on the northern California coast, and half of that in private hands rapidly being decimated by timber companies, there is no justification whatsoever for BLM to jeopardize any old growth acreage in its hands. 5% is scoffed at for being far too low a percentage by most old-growth scientists, but if that's all we have left, then we must defend all of it from human alteration.

RESPONSE TO COMMENT LETTER 165

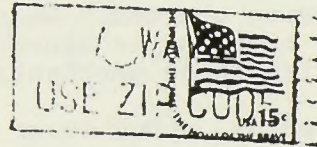
- 165-1 The FEIS has been changed to emphasize more protection of the Resource Area's old-growth values (see response 520-5). The cumulative impacts section has been expanded to include region wide effects of timber harvest and land disposal on the old-growth values within the Arcata Resource Area.
- 165-2 Reference to the TNC inventory on the old-growth reserves is also made on p. 1-4 of the DEIS. The TNC inventory was done over a three year period from 1983-1986.
- 165-3 The analysis of the management situation (AMS) was done in 1986 as part of the planning criteria stage of the RMP process. Copies of the AMS, which included the full text of the old-growth reserve studies and inventories by TNC and BLM were available for public review at the Arcata Resource Area and Ukiah District. Copies were also available at both public workshops and hearings on the DRMP/DEIS.
- 165-4 The list that appears on p. A-1 of the DEIS is composed of rating factors that the Bureau of Land Management Resource Staff considers relevant to determine 'old-growth significance' for BLM's reserve system. It has evolved from 1981 criteria set up by the BLM for the inventories (research) to be done by TNC to the 1986 list that appears in the DEIS.
- 165-5 See response 165-2 and 165-4.
- 165-6 As you state, many definitions of old-growth appear in the literature so it stands to reason that various combinations of criteria exist to define old-growth habitat. The Bureau of Land Management does not necessarily use the exact definition or set of criteria as the USFS to determine old-growth habitat. Our old-growth stands in most cases are quite different than Forest Service stands.
- 165-7 See response 165-6.
- 165-8 Gilham Butte, based on the Bureau's rating criteria, additional clarification from Katie Barrows (TNC), and input from an ad hoc old-growth study group has been categorized as having significant old-growth values to be given old-growth reserve status and designated as an ACEC/RNA. The text has been changed in the FEIS to reflect the new information received and the new management direction being applied. See p. 1-4, 2-91 and 3-21 of the FEIS.
- 165-9 See response 165-8.
- 165-10 See response 520-6.

John Lloyd,

With respect to BLM's Resource Management Plan for the Manila dunes, I recommend that the Bureau adopt alternative #2, the Enhancement of Natural Values, only if it is amended to prohibit all ORV use on the Manila dunes (as mentioned on pg. 4-3).

Thank you for your consideration of this option.

Shirley M. Nichols
1591 VERWER AVE
MC KINLEYVILLE, CA 95521
707-839-3931



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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Area Manager

Bureau of Land Management

P.O. Box 1112

Arcata, CA. 95521

TO WHOM IT MAY CONCERN:

ARA-302

You don't often hear from "Mr. and Mrs. Average Citizen". They are not the "Squeaking Wheels" that draw the attention of the "Powers that Be", or rouse the "Demonstrators" to action. We are not sensational enough to be interviewed and asked to express our opinions. We do exist though, plodding along, obeying the laws, and lending a helping hand where needed.

Those of us who are now classed as "Senior Citizens" have lived through the times of the great depression of the '29 and 30's, when there were no food stamps, welfare, Social Security or SSI. We tightened our belts again during World War II and either helped on the home front or left our homes to join the Services. We've been through the school of hard knocks and learned to be self-reliant, working our jobs in the years when wages were not inflated and tried to save as much as we could to tide us over the rough spots and be a nest egg for our retirement days. Inflation has now placed many of us in the position of having to rely on Social Security in these later years, rather than using it as a supplement, as it was intended to be.

Having learned our lesson of self-reliance, some of us who love the outdoor life and abhor the regimentation of retirement communities or the confinement of apartments and condominiums, have adopted the R.V. life-style. If necessary, we've sold our homes which we could no longer afford, and bought an R.V. in which to live full time.

This "Preamble" now brings us to the present time and the purpose of this letter, namely: People parking at the South Jetty.

Many of us "full-timers" are not affluent enough to be able to afford the luxury of full service campgrounds and still be able to buy the extra things that make life enjoyable, so we've learned the art of "Boondocking". To our self-contained R.V.s we've added solar panels or wind generators to keep our batteries charged. We take our holding tanks to the disposal stations to empty them and in appreciation for the availability of this service, we patronize these merchants.

There is a group of us, about 20 or 25 R.V.s, who have been returning to the South Jetty for the summer months for 8 to 10 years. Being Long Term Visitors, we do not park up close to the end of the jetty along the wall because we think it should be left open for the townspeople who come to picnic and fish. Contrary to the claims of the vociferous few who say we don't spend any money here and we're freeloaders who mess up the area, we buy clothes, fishing equipment, bait, gasoline, propane, food, eat in various restaurants on our trips to town, have our vehicles serviced and repaired buy tires, batteries, replace exhaust systems, buy solar panels, patronize the doctors and optometrists and some have had surgeries in the hospitals of both Eureka and Fortuna. We've bought Hondas and Kawasakis to take us to the fishing spots since we don't walk as well as we did in our younger years. We've bought small generators and have them serviced and repaired here. Radios, T.V.s, scanners, keyboard chord organs and trailers are also among our purchases. If we had to pay to camp, only the necesssities on the above list could have been bought and the money would have been spent on only a restricted few of the many businesses we've patronized.

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keep our campsites clean, believing we should enjoy our present pleasures in such a way as not to injure future ones. Now we hear rumors that all this area is to be closed to the public and used as a wild life sanctuary. We agree that some control needs to be exercised to protect the dunes and marshlands but hope that it will not necessarily be so restrictive as to force us to leave the area and deny the townspeople the right to fish and vacation here. Perhaps the north end of the Spit could be excluded in these plans to allow campers, fishermen and clammers to still enjoy their sport and have access to the beach tideland for ATV's. Signs could be posted to stop the mutilation of the dunes and the vegetation by wheeled vehicles.

If you have read this far---we thank you.

Signed: The Long Term Visitors to the South Jetty.

Virginia M. Shaw	MR. & MRS. James A. Nelson
Elaine Violet Wagner	Duff & Dorsey French.
Lucy Johnson	Henry & Ellanore McNaughton
Rue Burbridge	Eduard Beynon
Mr & Mrs M ^o Reynolds	Margarette Lemon
Glenn M ^o Reynolds	W. J. Baroin
Mr & Mrs Verle Hawes	Simon Baroin
Gladys Hunt	Albert C. Jones
Lordon Hunt	Gene S. Simpson.
Ed and George Davis	
Martina & Hale Anderson	
Russell & Edna Wallace	
Mel Dupzyk	
Ray & Edna Selzer	
John Bain	
Mr. & Mrs. James E. Galey	
Walt & Marge Bednarz	
Elmo & Edith Jernigan	

DOUGLAS H. BOSCO
437 DISTRICT, CALIFORNIA

COMMITTEES:
PUBLIC WORKS
AND TRANSPORTATION
MERCHANT MARINE
AND FISHERIES

Congress of the United States
House of Representatives
Washington, DC 20515

June 14, 1988

408 CANNON BUILDING
WASHINGTON, DC 20515
(202-225-3311)

SUITE 329
FEDERAL BUILDING
777 SONOMA AVENUE
SANTA ROSA, CA 95404
(707-525-4238)

THE EUREKA INN
SUITE 218
7TH AND F STREETS
EUREKA, CA 95501
(707-445-2055)

Mr. Al Wright
District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482

ARA-304

Dear Mr. Wright:

Although I support the general direction taken in the draft resource management plan for the Arcata Planning Area, I do have serious reservations about the proposed disposal of Gilham Butte and Iaqua Buttes.

Gilham Butte supports one of the last major stands of old-growth timber in the Mattole watershed. Its location between Humboldt Redwoods State Park and the King Range may constitute an important habitat link between these two protected areas. Although lack of public access is a legitimate concern, I don't think that factor by itself justifies disposal, particularly in light of the strong local support for its continued protection.

Iaqua Buttes plays a similar role as the only "island" of old growth in public ownership in the hundreds of square miles of timberlands west of the national forest, south of Redwood National Park and north of the state parks along the Eel River. Its unique location and demonstrated high wildlife values are ample justification for retention in public ownership.

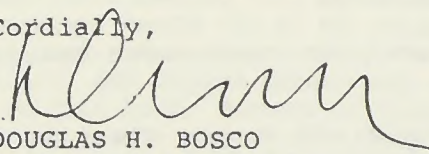
While neither of these two areas is particularly unique as old-growth habitat, they may in the future come to be seen as important elements in the overall effort to provide for diversity on a regional basis. I suspect that public agencies will be expected to bear an increasing burden of responsibility in this area in the future, and I think it would be unwise to limit BLM's options too much at this time.

I also think the State Lands Commission's stated intent to claim any BLM lands in this area that have commercial timber value effectively undermines the original rationale for disposal of Gilham Butte and Iaqua Buttes.

Mr. Al Wright
Page 2
June 14, 1988

I believe BLM has done a good job of managing its lands on the North Coast and I would prefer to see these two areas remain under your agency's continued management.

Cordially,



DOUGLAS H. BOSCO
Member of Congress



United States Department of the Interior

FISH AND WILDLIFE SERVICE
SACRAMENTO ENDANGERED SPECIES OFFICE
2800 Cottage Way, Room E-1823
Sacramento, California 95825-1846

RECEIVED
MAY 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

MEMORANDUM

ARA-306

APR 29 1988

To: Area Manager, Bureau of Land Management, P.O. Box 1112,
Arcata, CA 95521

From: ^{Adm} Field Supervisor, Endangered Species, Sacramento, CA
(SESO)

Subject: Comments on Draft Arcata Planning Area Resource
Management Plan and Environmental Impact Statement
(Case No. 1-1-88-I-423)

This memorandum is in response to your recent request for comments on the Arcata Planning Area Resource Management Plan (Plan) and Environmental Impact Statement. These comments will focus on the preferred action and alternatives for particular management areas and their effect on federally-listed (i.e., McDonald's rock-cress, Arabis mcdonaldiana) and candidate plants, especially Menzies' wallflower (Erysimum menziesii), a category-1 species. Other candidate species issues will not be addressed.

RED MOUNTAIN MANAGEMENT AREA

As we indicated in earlier memoranda, the Red Mountain area harbors the only known populations of McDonald's rock-cress and three candidate plants. On April 15, 1988, we provided informal consultation to your District Manager on the draft activity plan for the Red Mountain Area of Critical Environmental Concern and Research Natural Area. We offer no additional comments beyond those detailed in that memorandum (see enclosure).

SAMOA PENINSULA MANAGEMENT AREA

The Samoa Peninsula, including both the Samoa and Manila Dunes parcels of public land, contain stands of Menzies' wallflower. The Humboldt Bay populations of E. menziesii, which likely will be described shortly as a distinct subspecies (Price 1987), continue to be affected by off-road vehicle (ORV) use, encroaching exotic vegetation, coastal development, and other anthropogenic activities. As a result, this species is a high-priority candidate for listing with this office.

The Bureau proposes to undertake the "no action" alternative among four "alternatives" presented in the Plan. The "Resource Condition Objectives" for these alternatives seem to be largely guided by ORV considerations. Because recreational concerns dominate the "Land Use Allocations" and "Management

Actions" of all four alternatives, these alternatives (including the so-called "enhancement of natural values" alternative) do not vary significantly in their level of protection or enhancement of wallflower habitat. This assertion is substantiated by table 2-1 (page 2-89) in the Plan, which indicates that the impacts to botanical resources from the four alternatives would be the same.

306-1

In our memorandum of April 11, 1984, to your District Manager, we concluded that "the proposed ORV designation and subsequent development of staging areas and campgrounds on the Samoa Peninsula is likely to severely and adversely impact Menzies' wallflower and wetlands." Much of this concern centered on the off-site effects of the proposed Samoa ORV Park, which would likely lead to further and continued ORV activity on adjoining City of Eureka (City) lands. After an onsite review and additional meeting with the Bureau, the agency committed to fence via cable barriers nearly all of the wetlands and 40 acres of wallflower habitat on Federal land. More importantly, the Bureau in concert with the City, County of Humboldt, and Coastal Conservancy agreed to fence 80 acres of wallflower habitat on City land. Because of these modifications, we withdrew our opposition to the project in a memorandum on July 24, 1984.

Although the Bureau has fenced their 40-acre wallflower site and shortly will fence the wetlands on Federal land, the 80-acre wallflower parcel remains unprotected (pers. comm., April 27, 1988, Bruce Cann, Outdoor Recreation Planner, Arcata Area Office). Thus, the off-site effects of the Samoa ORV Park likely are contributing to the degradation of City-owned, wallflower habitat. This situation clearly violates our understanding of the ORV project and the protection to be afforded adjoining lands as discussed in meetings and in our memorandum of July 24, 1984.

306-2

Because none of the four alternatives will seek the elimination of ORVs from Federal lands on Samoa Peninsula or, at a minimum, ensure that the 80-acre site is fenced, we do not support the preferred action or the three alternatives detailed in the Plan. However, if the 240 acres of Federal land to be disposed of and the 42-acre parcel to be acquired in the "administrative adjustments" alternative were transferred to The Nature Conservancy or Service, we would support and recommend the adoption of this alternative. Under such an arrangement with the Service, our Humboldt Bay National Wildlife Refuge would manage these Federal lands on Samoa Peninsula primarily for the maintenance and enhancement wallflower habitat and wetlands.

306-3

Although the Bureau stated that its goal for the entire peninsula is "to develop an overall strategy with other landowners for protecting the sensitive natural values while still providing ORV opportunities" (page 3-6 of Plan), the absence of any protection (e.g., fencing, barriers) of the City-owned, 80-acre parcel makes such a strategy highly questionable. Moreover, the Bureau estimates that recreation use on the Samoa Dunes will increase from 8,000 visitor days per year to 17,000 visitor days per year (page 4-1 of the Plan). Given this situation and the critical status of the Menzies' wallflower, the Bureau should undertake only those actions ensuring the long-term survival of the wallflower on both public and private lands on Samoa Peninsula (i.e., seek closure of the area to ORVs).

306-4

COVELO VICINITY MANAGEMENT AREA

The proposed action, to dispose of 66,500 acres of Federal land, may adversely affect a candidate plant (Pogogyne douglasii var. parviflora) if the recipient of the former BLM-managed lands is not a Federal agency (i.e., U.S. Forest Service). If the State or private landowners are to receive these lands, we recommend that the parcels harboring the candidate plant be retained in Federal ownership or the habitat be permanently secured in some manner (e.g., conservation agreement).

306-5

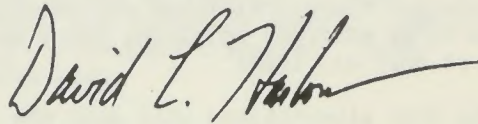
SCATTERED TRACTS MANAGEMENT AREA

Because of potential impacts to candidate plants, we recommend that any ultimate decision on disposition of The Cedars parcel be coordinated through this office.

OTHER MANAGEMENT AREAS

We have no comments on the proposed actions for these management areas.

Questions regarding the Humboldt Bay National Wildlife Refuge should be addressed to either Richard Coleman or Ben Crabb at 415/792-0222. Other questions regarding this memorandum should be addressed to Jim Bartel or me at 916/978-4866 or (FTS) 460-4866. Thank you for the opportunity to provide our comments this planning effort and its effect on endangered species.



Enclosure

cc: Chief, Endangered Species, Portland, OR (AFA-SE)
Project Leader, Ecological Services, Sacramento, CA (ES-S)
Refuge Manager, San Francisco Bay National Wildlife Refuge, P.O. Box 524,
Newark, CA 94560
State Director, Bureau of Land Management, 2800 Cottage Way, Sacramento,
CA 95825
Susan Cochrane, California Department of Fish and Game, 1416 Ninth
Street, Room 1225, Sacramento, CA 95814
Liza Riddle, California State Coastal Conservancy, 1330 Broadway, Suite
1000, Oakland, CA 94612
Director, Eureka City Planning Department, P.O. Box 1018, Eureka, CA
95501
Ken Berg, California Native Plant Society, 909 12th Street, Suite 116,
Sacramento, CA 95814
Steve Johnson, The Nature Conservancy, 785 Market Street, San Francisco,
CA 94103

RESPONSE TO COMMENT LETTER 306

- 306-1 The level of protection outlined in the alternatives for the Samoa Peninsula do not differ significantly for the Samoa Dunes Area but does for the Manila Dunes parcel. For example, the Enhancement of Natural Values Alternative eliminates ORV recreation use on the Manila parcel entirely. See Impacts on Botanical Values and Passive Recreation, p. 2-92.
- 306-2 Specific concerns of off site impacts are addressed with site specific activity plans and are not in the scope of this RMP/EIS. The concerns you have addressed will be looked at as part of the regional wide ORV use plan being drafted at this time. See p. 2-4, FEIS.
- 306-3 See p. 2-4 FEIS on changes that have occurred on the Samoa Peninsula since 1986 and management direction to be followed until the region wide ORV county plan is written. Our management actions will be consistent with this plan. See response 520-1.
- 306-4 See response 520-1.
- 306-5 All tracts of land to be disposed are subject to threatened and endangered plant and animal and cultural clearances. If T&E plants are found on the parcel, mitigations to address this concern must be found or disposal cannot occur. Site specific analysis is addressed through an environmental assessment/land report done for every disposal action. See p. 1-9, DEIS.

STATE OF CALIFORNIA
STATE LANDS COMMISSION
1807 13TH STREET
SACRAMENTO, CALIFORNIA 95814

JORGE DEUKMEJIAN, Governor

April 1, 1988

File Ref: W 21993

Alfred W. Wright
District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482-5599

ARA-317

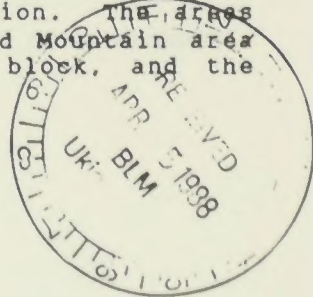
Dear Mr. Wright:

This is in response to the Draft Resource Management Plan and EIS for the Arcata Resource Area and deals primarily with the State Indemnity Selection issue.

An 1853 Act of Congress granted approximately 5 1/2 million acres to the State of California to be used as a revenue source to support public schools. (In 1984, the legislature directed school land revenues to the State Teachers Retirement Fund), of this, only about 52,000 acres is yet to be acquired by the State. The desirability of the State selecting some of the BLM lands in the Arcata RA to help satisfy this entitlement is now being re-evaluated by the State Lands Commission (SLC).

To comply with the intent of the federal grant, it follows that lands selected to satisfy the grant should be capable of providing revenue. In 1986, SLC affirmed its interest in a possible future selection of about 20,000 acres within the Arcata Resource Area. The lands proposed for possible selection were found, by a preliminary SLC staff study to be those capable of providing revenue primarily through harvest and sale of forest products. The staff study recognized that protection of associated environmentally sensitive values must be accommodated in its management of these forested lands. Therefore only those lands on which sensitive values are not critical, or where they could be mitigated as part of revenue-producing timber harvest were sought as potentially suitable for selection.

As regards the Draft Resource Management Plan, it appears that those lands for which the stated preferred alternative is either disposal or federal retention for timber production may meet the SLC staff's criteria for State selection. The areas meeting those criteria are Lacks Creek; the Red Mountain area (the scattered blocks north of the Red Mtn. block, and the



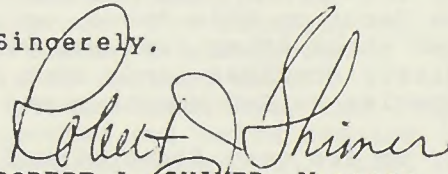
April 1, 1988

Brush Mtn-Elkhorn Ridge block south of Cummings (minus the Eel River Wild and Scenic River corridor and any part of the Coast Range Preserve); the Covelo area (Iron Peak and Brushy Mtn blocks minus the W&SR corridor) and the Scattered Tracts Area (the Indian Creek block just west of Ukiah). If the Commission decides to proceed with an indemnity selection in this Resource Area, the final selection may end up totalling only a subset of these blocks.

One must assume that federal and State management of these harvestable areas would be similar and that the only real difference, if transferred to State ownership, is the disposition of revenues. In essence then, it appears that it is not a matter of whether federal foresters and wildlife biologists can manage the lands better than State foresters and biologists but rather whether it is preferable for the revenues generated to go to the federal reclamation fund or to the State Teachers Retirement Fund.

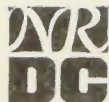
In summary, SLC is re-evaluating its indemnity selection options. Only those lands the Draft Plan identifies for disposal (to the State or others) or management for timber production may meet the State's criteria for selection. The State's management of these lands would parallel federal management. Those non-revenue producing lands identified in the plan as more suitable for federal protection of environmental values would not be considered for State selection.

Sincerely,



ROBERT J. SHIMER, Manager
School Lands Section

54181



Natural Resources
Defense Council

ARA-320

90 New Montgomery
San Francisco, CA 94105
415 777-0220

April 28, 1988

John Lloyd, Area Manager
Bureau of Land Management
1125 16th Street
Arcata, CA 95521

Re: Draft Arcata RMP/EIS

Dear Mr. Lloyd:

We are writing on behalf of the Natural Resources Defense Council (NRDC) to comment on the draft plan and environmental impact statement for the Arcata Resource Area. NRDC is a non-profit, environmental organization with 83,680 members nationwide, including 17,259 in California. We appreciate the time taken by you and your staff to brief us on the issues involved in the plan, including the management difficulties that are posed by the need to respond to the state's in lieu requests.

One of our top priorities is to ensure preservation of viable old-growth ecosystems on the public lands. The BLM's holdings in northern California are particularly important because they connect larger old-growth areas on national forest and national park lands. Although our comments focus on this issue, we remain interested and concerned about other resource values in the area, particularly roadless lands such as the Cahto area and rare plant species on Red Mountain and other places.

Overall, we are very disappointed by the BLM's preferred alternative, which proposes to log and/or dispose of many important old-growth stands. The agency has failed to analyze in any detail the adverse environmental consequences that will inevitably occur if the draft plan is implemented. Although we support certain elements of the draft plan -- particularly the management of the important Butte Creek area -- we strongly urge you to revise management proposals for the rest of the resource area in order to ensure necessary preservation of the irreplaceable old-growth forests.

320-1

The draft plan appears to acknowledge the potential importance of the Arcata Resource Area in creating a viable

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John Lloyd, Area Manager
April 28, 1988
Page 2

network of old-growth stands and spotted owl territories. The environmental impact statement (EIS) notes that these lands "may play a crucial role in maintaining genetic links between habitat areas and sustaining a proper distribution of owls throughout their historic range." EIS, p. 3-1. The EIS also reveals that this area "may represent important reservoirs of old-growth and mature forest species; they have the potential to provide long-term unique and diverse habitats." EIS, p. 3-2.

Notwithstanding this recognition, however, the BLM has significantly downplayed, if not ignored entirely, the adverse impacts that will result from implementation of the preferred alternative. For example, the BLM states that a number of spotted owls "will be displaced" by proposed logging and land exchange. EIS, p. 4-22. In fact, because there are no available areas to which the owls can relocate, the real effect of the plan will be to reduce the population. The agency has completely failed to analyze the impacts of this reduction on the viability of the spotted owl in the immediate area or regionwide. Moreover, the agency has ignored the fact that management plans that result in the destruction of spotted owls may well violate the Migratory Bird Treaty Act.¹

320-2

The EIS underestimates likely adverse impacts on the spotted owl in another important way. The agency appears to assume that the spotted owl's habitat needs are far smaller than the scientific data support. For example, the agency states that protecting 1,910 acres of old-growth will provide habitat for "three pair of spotted owls." EIS, p. 2-97. In fact, as the EIS states elsewhere, the best available research show that spotted owl pairs require from 2,200 acres to nearly 5,000 acres of old-growth. EIS, p. 3-1. The Forest Service, which manages nearby lands, has issued direction requiring preservation of 1,000 acres of core habitat plus at least 650 acres of replacement habitat for each pair of owls.² Thus, it is apparent that protecting 1,910 acres of old-growth is far too little to

320-3

¹ See Plaintiffs' Memorandum in Support of Motion for Summary Judgment, pp. 32-41, Portland Audubon Society v. Hodel, Civil Action No. 87-1160-JU (D. Ore.).

² USDA Forest Service, Pacific Southwest Region, Land Management Planning Direction, pp. 4-17, 4-21 (January 15, 1984).

provide habitat for 3 pairs of owls and that the BLM's plan will eliminate even more owls than the EIS admits.

The proposed management plan for the Arcata Resource Area fails to satisfy the requirements of the BLM's own "policy statement" on "sensitive species management." EIS, p. A-19. Under this policy, the agency must "ensure that the critical habitats of sensitive species [including the spotted owl] will be managed to minimize the need for listing those species." The BLM must "prevent deterioration of sensitive species' habitat" and "minimize the decline of those species." EIS, p. A-20. By destroying large expanses of suitable spotted owl habitat, the BLM is failing to heed its own policy.

320-4

The BLM's management and analysis of old-growth, upon which the spotted owl is dependent, is flawed for other reasons. The BLM attempts to downplay the effects of destroying old-growth forests by stating that such loss "will not be irreversible." EIS, p. 4-23. But there is no scientific support for the agency's apparent view that old-growth stands can be created through "reclamation efforts." Id. To the contrary, the Society of American Foresters has found that "there is no evidence that old-growth conditions can be reproduced silviculturally" and that "the question is essentially moot, as it would take 200 years or more to find an answer. Old-growth management, for the foreseeable future, will be predicated on preservation of existing old-growth stands."³

320-5

Another serious shortcoming is the BLM's failure even to identify all of the old-growth stands in the resource area. The BLM admits that over half of the "old-growth reserve" will be "lost as a result of timber harvests and land disposals." EIS, p. 4-22. But the BLM has failed to identify the old-growth stands that occur outside of the so-called "old-growth reserves." It cannot reasonably be disputed that a complete inventory of old-growth is a necessary prerequisite to an adequate analysis of the plan's impact on this irreplaceable resource. The agency's failure to obtain and display this information violates the National Environmental Policy Act and the Council on Environmental Quality regulations. See, e.g., 40 C.F.R. § 1502.22.

320-6

³ Society of American Foresters, Scheduling the Harvest of Old Growth, p. 31 (1984) (emphasis added).

John Lloyd, Area Manager
April 28, 1988
Page 4

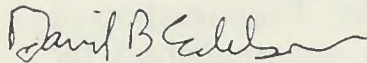
Except for the proposed management of the Butte Creek area, which we strongly favor, the plan's treatment of old-growth and spotted owls should be significantly revised. Areas such as Lacks Creek and Red Mountain, which contain important old-growth stands and provide habitat for spotted owls, must be managed to preserve these values. We are also firmly opposed to the proposed disposal of any lands that possess important natural values, including the old-growth stands in the Covelo area and other scattered tracts, unless the BLM acquires lands of equal or greater ecological importance in return.

320-6

In conclusion, we are very disappointed with the BLM's draft plan because it will destroy irreplaceable old-growth stands and all associated values, including the northern spotted owl. The plan and EIS suffer from critical legal, policy, and factual deficiencies. For these reasons, we urge you to reconsider the proposed management of this area. Failure to do so will very likely result in administrative challenges if not litigation.

Thank you for considering our views.

Sincerely,



David B. Edelson
Johanna H. Wald
Senior Attorneys

RESPONSE TO COMMENT LETTER 320

- 320-1 See responses 520-5, 165-8, 442-3, and 481-4 which reflect the changes incorporated in the Final EIS to protect old-growth values in the Arcata Planning Area.
- 320-2 The FEIS has been expanded to include a discussion of the cumulative impacts on the spotted owl of implementing the preferred alternative. Refer to page 4-20. In addition, consultation with USFWS will occur pursuant to Section 7(a)(4) of the Endangered Species Act on any action, including proposed timber sales, that may impact the spotted owl or affect its recovery.
- 320-3 The statement that "1910 acres of old-growth will provide...for three pair of spotted owls" is based on the fact that three pair of spotted owls presently inhabit these areas. The 'best available research' has never seemed to apply to the BLM forested lands in the Arcata Resource Area. Also see responses 442-2, 520-6.
- 320-4 By providing significant old-growth reserve areas throughout the planning area as well as site specific mitigations for spotted owls in the Red Mountain management area, supplemental habitat will exist to minimize the decline of the spotted owl as a result of BLM actions. Also see responses 417-11, 320-2.
- 320-5 The concept of 'recruitment areas' for old-growth habitat perpetuation is a complex management scenario. Preservation of old-growth values on the short term can be accomplished by simply preserving existing old-growth stands. In the long run some 'reclamation effort' or recruitment of old-growth areas must be inputted into the old-growth management equation. Since old-growth habitat can be created over a certain period of time (200+ years) it does not qualify as an irreversible loss.
- 320-6 See responses 473-9, 165-3,4, 520-5, 405-11, 417-12. All these responses illustrate protection afforded to old-growth habitat and associated values as proposed by the FEIS.

Barbara Sher, MA, OTR
101 Star lane
Whitethorn, CA. 95489

ARA-326

Dear Mr. Wright

I am writing about retaining the Old Growth Reserve System and all the parcels of old growth in the Arcata Management Area as well as saving the Gilham Butte.

The argument I offer for saving Gilham is that there are diverse flora and fauna, it has old growth stands and is valuable as a habitat for wildlife. Golden eagles have been sighted there by local residents. Gilham Butte is easy to manage and its geology makes logging unwise, especially because of the potential watershed damage.

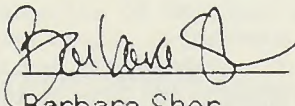
The arguments in favor of retaining the Old Growth Reserve Sytem are, to me, even stronger. Humboldt Co parks do not contain old growth Douglas Fir forest and less than 5% of the original old growth remain on the Pacific coast.

Just as we need Old Growth Redwood , coniferous forest are microclimates in which different species live. Spotted owls, for one, are getting rare because of logging practices.

We owe it to future generations to designate these valuable areas as wilderness sections. We need them!!

Please think in the long run about what is happening now.

Thank you


Barbara Sher

cc John Lloyd

RECEIVED
MAY 16 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Al Wright
Ukiah Dist. Manager
555 Leslie Street
Ukiah, CA 95482

ARA-327

Mr. Wright,

I would like to write my concern about Gilham Butte being preserved. By the very fact that only 5% of the original old-growth of coniferous forests remain on the Pacific coast compared to what we had 100 years ago makes me fear that in 20 years there will be nothing left. In less than 100 years 500 years of Doug fir forest has been logged. That alone is enough to stop anyone and cause them to take a further look. But that isn't the only issue at hand. The mix of hardwoods and Doug fir comprise a variety of canopies of habitats that support many plant and animal species. The old-growth forest provides birds, insects, and small mammal nests and is necessary in order for them to live. The rare spotted owls alone need approximately 2000 acres for each pair for their habitat. They are dependent on old-growth forests for their diet of red tree vole, which depends on old-growth habitat. Their existence is threatened also. The Golden Eagle resides at Gilham Butte, as well as the pileated Woodpecker, hermit thrust, and goshawk. The flora and fauna is remarkably diverse as well. There will be considerable watershed damage if logging were to take place. The local creeks are still recovering from past logging 20 to 30 years ago. The sedimentation alone would fill the spawning gravels and rearing pools for the steelhead, and silver and king salmon.

If this isn't enough to realize that Gilham Butte must be preserved at least the awareness of its easy management without logging could be a consideration.

A Concerned Citizen,
Michael Balt
Michael Balt
Box 653
Miranda, CA 95553

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MAY 17 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

LARRY AND JEANNIE MALATO
P.O. Box 525
Avon, Colorado 81620

ARA-338

May 1, 1988

Al Wright
Ukiah District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, California 95482

RECEIVED
MAY 23 1988

RE: GILHAM BUTTE

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Dear Mr. Wright:

We are landowners of 120 acres of land adjacent to Gilham Butte, at the headwaters of Mattole Canyon Creek and Salmon Creek. We were residents of our homestead there from 1975 to December, 1987. Since our land was logged in the 1950s, it stands in stark contrast to the surrounding old growth fir forest of adjacent Gilham Butte. Even after thirty years, our land has massive (and worsening) landslides (three areas of 50+ acres), averages 15 to 20° warmer than the Gilham Butte acreage, has virtually no topsoil, and, of course, has no trees - no old trees and few young healthy firs. Our water supply is degraded and tentative; there is plenty of water but we have been told because of the lack of tree cover and movement of the land which resulted from tree "harvesting", our water supply was grossly disturbed and is in the process now of re-establishing permanent pathways and underground reservoirs, which make take hundreds of years. In addition, when it rains our water is not potable without a sophisticated filtering system, because of massive erosion due to lack of cover and topsoil.

Scores of experts from the BLM, or experts hired by the BLM, have visited us and our land over the past 12 years, to do various surveys required by your agency. Almost every one of them has commented on the vast contrast of our acreage compared to the surrounding Gilham Butte acreage. Our land stands (or slides) as a testimonial as to what will happen to Gilham Butte if it is logged; we have the same steep, fragile soils, the same topography.

We are greatly disturbed by several blatant inaccuracies in your draft Resource Management Plan, which states that Gilham Butte has severely limited perennial water and a low diversity of flora and fauna. Anyone who has ever been up to Gilham Butte knows that it contains many tributaries of Westlund and Gilham Creeks, and the headwaters of Mattole Canyon Creek, Grindstone Creek and Salmon Creek are actually only feet from the BLM border. In actuality, Gilham Butte, being the highest point central to these five major creeks, contains the headwaters of each, either underground or aboveground. Any hydrologist could tell you that. And containing the headwaters of these creeks means that any

338-1

(Continued)

May 1, 1988

disturbance on Gilham Butte will affect the five main watersheds - degradation of water supplies for hundreds of families. Also, a great deal of private and government funded restoration work has been completed during the last ten years on these creeks. Fishery habitats are now tentatively being restored to these creeks. Gilham Butte is the source of all this water, and as an old growth reserve it was possible in many instances to obtain federal and state monies for these restoration projects. A logging operation on Gilham Butte would destroy habitat and create massive sedimentation that would bury spawning grounds and ruin years of work.

We can't believe that your Draft RMP stated that Gilham Butte "has a low diversity of flora and fauna..." -We have seen scores of varieties of animals on Gilham Butte that we have seen nowhere else (on our land we have deer, rattlesnakes and gophers), including golden eagles, bald eagles, and we have heard the cries of spotted owls while in the company of two experts hired by your agency to look for the same. You either did not look in your files, or did not research this question properly, or are choosing to ignore the truth to further your own purposes.

338-1

It seems that your agency has drifted away from your previous course of action of consolidating and managing the Old Growth Reserve System in favor of "disposing" of old growth areas. The fact is, all northern California old-growth forests in private hands are scheduled for logging in the next twenty years. This makes it essential that BLM retain all of its existing old growth areas in the Arcata Management Area, and maintain its Old Growth Reserve System. Your Draft RMP proposes that you can log an old-growth area and still preserve old-growth characteristics. This is pure baloney, as all of the private, logged land surrounding Gilham Butte will attest to. It took 200 to 300 years for the largest trees on Gilham Butte to grow; remove them and obviously "old growth characteristics" cease to exist. Gilham Butte is also a strategic location as a "genetic seed island" for old-growth dependent species because it is near old-growth areas in the King Range, and it is imperative that it remain as such so the surrounding land can restore itself over the course of the next several hundred years.

338-2

The fact is, Gilham Butte would be incredibly easy for your agency to "manage" -- just leave it alone. There is not a lot of work to be done in managing an old growth forest -- management problems arise only for timber production areas. In the past, many fine management ideas regarding Gilham Butte have emerged from your agency. What ever happened to the trail from Humboldt Redwoods State Park, through Gilham Butte to The King Range National Conservation Area?

(Continued)

May 1, 1988

We request that you take our comments into consideration, and that your No Action Alternative be implemented, permanently making Gilham Butte an old-growth reserve area.

Would you please also change our mailing address to:

Jeannie and Larry Malato
P.O. Box 525
Avon, Colorado 81620
Telephone: (303) 949-1368

and send us a copy of the Draft Resource Management Plan and Environmental Impact Statement, since we had to borrow a copy.

Please feel free to call us at any time for access to Gilham Butte for management purposes.

Sincerely,

Jeannie Malato
and Larry Malato

cc: John Lloyd
Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

cc: Bruce Caan
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

RESPONSE TO COMMENT LETTER 338

- 338-1 See response 165-8.
- 338-2 See responses 473-9, 520-5.

Mr. John Lloyd
Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

Phillipsville, CA 95557
5/17/88

RECEIVED ARA-339
MAY 23 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Dear Mr. Lloyd,

I am a school teacher with the Southern Humboldt Unified School District. I have heard about the proposed disposal of BLM's Gilham Butte lands; and I would like to persuade you that we need Gilham Butte to remain as it is — unharvested, undeveloped, and under the protection of BLM.

I know that Gilham Butte has lots of old fire ready to be logged. Leave them alone. Without them covering my neighborhood's highest point, the rain will bring down what there is of the "sponge" that holds and provides water for our Salmon Creek and tributaries. There are lots of animals and human families — mine included — that depend on these creeks! Without the "sponge" of tree canopy, roots

mulch that covers Gilham Butte, 4" rain would run right off, and without that slow-release reservoir, our creeks would dry up in the summer.

I know that our society uses more wood products every year. But cutting down the last old-growth stands is a mistake. Is it true that the timber harvesters' plan for "perpetual return" just isn't working out? Do they have to rely on you to grab up public lands for cheap to be able to break even? I doubt it. We have forest land in production that's being harvested and replanted. There's only a little bit of our land that's allowed to be free of man's development. Please save Gilham Butte, and keep the Old Growth Reserve System intact. We'll never know how much we've lost if we let it go.

Sincerely,
Dail A. Gibson

July 15, 1988

Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

ARA-393

Re: Arcata Planning Area Resource Management Plan

Dear Ladies and Gentlemen,

I am a landowner and 12-year resident of a 100-acre parcel of land in southern Humboldt County which has a common boundary with the BLM-owned parcel of old-growth forest known as the Tom Long Parcel. According to the Arcata Planning Area Resource Management Plan the Tom Long Parcel is slated for "disposal". I assume, of course, that this means the old growth trees will be logged after said disposal, or sale to a logging company. This is going to have a severe impact on my land and residence and especially on Tom Long Creek which runs through my property. The extremely steep slopes in the Tom Long watershed have always caused massive erosion and huge landslides when the land is logged. This area has already been logged extensively and the ill effects of those past endeavors are still very much in evidence today, even twenty years after. There is no other parcel of old-growth forest in this area and I consider it highly irresponsible of BLM to even consider abandoning its old growth reserve system, thus allowing some of the last old-growth forest in the county to be destroyed.

The residents of the community in the Tom Long Creek watershed are unanimously in favor of BLM's restoring the Old Growth Preserve System and of the Tom Long Parcel being managed as an Old Growth Preserve. The Tom Long Watershed Association has written a proposal to manage the Tom Long Parcel as a preserve. I urge you consider this proposal seriously as a means of preserving old-growth forest in this once-beautiful area that has suffered from over-logging in the past and has only just begun to recover.

Thank you for your time.

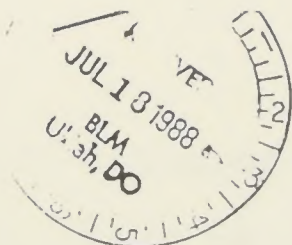
RECEIVED
JUL 19 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Sincerely,

Bonnie K. Burgess
Bonnie K. Burgess

PARCEL # 216-023-19



ARA-405

PO Box 700
Garberville CA 95440
15 July 1988

Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482

The following comments are in response to The Arcata Planning Area Resource Management Plan and EIS. First of all, I would like to apologize for a statement that I made at the public hearing in Garberville on May 16 regarding scoping. At that time, I indicated that the Tom Long Watershed Association had not received any notice of the scoping process. This was an error. Subsequently I have found the announcement of the scoping process in my files. I would appreciate it if the hearing record was corrected in this regard.

I do have a number of criticisms that I would like to place in the record. Some of these are elaborations of statements that I made at the public hearing while others are new material.

1. While it is appropriate for BLM to revise their management plans in accord with present reality, it is not appropriate to subvert the essence of the prior management plan simply for the reasons of bureaucratic expediency. It is true that the composition of the district has changed considerably since the last planning document. However, the principles articulated in the Timber Management EIS for SYU 13 received nationwide praise, and to reverse this direction is uncalled for by the current composition of National Resource Land in the District.

405-1

2. The document is poorly organized, contradictory and in many places difficult to follow. It is not an easy document for the lay public to digest or evaluate. Whereas the planning document for SYU 13 instructed the reviewer in a variety of management principles, the current RMP assumes competency on the part of the reader.

405-2

3. Scoping was inadequate. The issues selected for analysis is evidence of this. The four issues that were chosen (spotted owls and other old growth forest values, forest development and availability of timber to market, land tenure adjustment, sensitive plant habitat--Manila dunes) neglect other major concerns within the Planning Area such as recreation, watershed protection, habitat, fisheries, soil protection.

405-3

4. The issues that the Draft indicates were dropped from further analysis are very narrow ones. Much larger issues such as the ones indicated in #3 above were obviously dropped from analysis although no where is this stated.

405-4

5. Among the contradictions in the Draft, a glaring one is

found on page 1-7, under decisions incorporated by reference. This states that "the basic timber management parameters as presented in SYU 13 EIS/ROD are not changed. Analysis will be focused on mitigations and commitments regarding old-growth habitat retention and management." The Preferred Alternative embodied in the Draft releases a tremendous quantity of old growth habitat for disposal. Nor does it reaffirm that timber will be managed consistent with the silvicultural prescriptions laid out in the SYU 13 EIS/ROD.

405-5

6. The General Policies and Standard Operating procedures are both self-contradictory as well as contradicting other sections of the plan. For example, Section #5 indicates a variety of rational for preserving various values of the land. Yet where these values are in conflict with ease of management, the Draft calls for disposal of the lands. #7 states that "the Bureau will give priority to the designation and protection of Areas of Critical Environmental Concern," yet the Draft calls for the disposal of several areas selected as candidate old-growth reserves. This is done without any explanation other than, for example, the statement that "Gilham Butte and Big Bend are unsuitable for further protection." #10 states that "alternative management schemes--creative partnership" will be considered, yet no such considerations other than research relationships with universities are made within the Draft.

405-6

7. Although I am not intimately familiar with many of areas covered by the Draft, I have found significant errors in land descriptions referring to those areas with which I am familiar. For example, two blocks of NRL, one in the Bear Buttes Area and one near Old Harris are slated for disposal in the RMP. In fact they have both already been exchanged (I refer to R5E,T5S secs. 7-8, and R3E,T3E). The legal description of the Tom Long Parcel either by accident or design neglects NRL located in section 19. These errors lead me to believe that there may be many more specific errors which my on-the-ground experience is inadequate to catch. Inaccuracies such as these coupled with the general vagueness of other aspects of the Draft, make the RMP difficult to accurately assess.

405-7

8. In general the description of management alternatives including the preferred alternatives lacks specificity. Statements such as "provide opportunity for nonconsumptive recreational uses," is far too abstract to give the reviewer a clear indication of what the Bureau intends. This kind of vagueness permeates the Draft. Additionally some of the language in the Draft seems designed to mislead the casual reader. For example, the preferred alternative for the Red Mountain Management Area is known called "enhancement of Natural Values," implying a conservation oriented alternative. Yet in fact, this alternative indicates that timber harvest while originally staying at the same level as current management, could be increased as much as five fold.

405-8

9. Since the Draft calls for the disposal through exchange

or sale of over half of the National Resource Lands in the planning area, the draft should rightfully deal with the full environmental consequences of releasing these lands to private ownership. In fact the Draft does not. Essentially the release of these lands consigns them to fairly immediate logging of any remaining old growth timber on them. This dramatically steps up the pace under which these lands would be logged if they stayed under the jurisdiction of BLM. Annual cut under the EIS/ROD governing the management of SYU 13 was carefully determined within a scheme of old-growth management. By releasing as much timber to the market as the present Draft does, there will be an inevitable degradation of the resource values which the previous planning documents on SYU 13 sought to maintain. The Draft is woefully deficient in dealing with the true impact of such a vast transfer of land.

405-9

10. Except for the Covelo Management Unit, which seems to be too far away from the Ukiah office to be easily managed (come on!), the rationale for allocating various tracts for disposal is often unstated or unclear. The environmental impacts as mentioned above, of this disposal are also unclear, and we are asked to accept the preferred alternatives in this Draft on the basis of promised future site specific evaluations. This makes it obviously difficult to determine the adequacy of the draft.

405-10

Additionally acquisitions are called for in the preferred alternative for the Red Mountain Planning unit, but they are only vaguely identified.

11. Chapter 3 of the Draft provides data about the affected environment which is in clear contradiction to the management alternatives selected as preferred alternatives. The information regarding spotted owls is contravened by the alternatives with regard to the range needs of the owls.

In the section entitled "Significance of Old Growth," the draft makes an attempt to downplay the viability of the smaller tracts of old growth that the Bureau manages as not being large enough to provide enough habitat for old growth dependent species. In fact the Bureau should continue to hold these small islands of old growth because in fact they constitute the last hope for old growth dependent species in large portions of the Planning Area. If these tracts do leave BLM management, they will undoubtedly be logged, thus foreclosing any chance for remaining old growth dependent species in large portions of the region.

405-11

12. Chapter 4, "Environmental Consequences" deals very narrowly with the full environmental consequences of the proposed action. For most of the management areas it limits consideration of environmental effects to the availability of timber and effect on timber management, impact to spotted owls, and impact on indemnity selection, and other manageability questions. Lacking from this section are broader environmental consequences such as watershed, erosion, broader wildlife considerations, impact to fisheries and a host of other questions that one would hope would be considered in a full environmental statement.

405-12

13. Over the years the Ukiah District of BLM has cultivated a constituency of citizens concerned with public land use issues. During the tenure of several District Managers this constituency has been encouraged to participate in BLM planning processes. Many of these people live in close proximity to BLM lands and have vital concerns regarding the disposition of this NRL. The Ukiah District is honor bound to involve this constituency in its planning process. This document seems to be a violation of that trust.

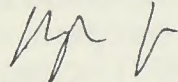
405-13

In addition to these comments I would like to indicate that I support the concept of the old-growth reserve system. I would like to see the final document pay attention to this concept in a much more thorough way than the present RMP does. I support the inclusion of as many of the old growth parcels as can feasibly be included in such a system. Additionally I support the notion of a citizens committee established for the purpose of evaluating the candidate areas for incorporation into a reserve system.

405-14

And lastly, I support the work of the watershed associations proximate to Gilham Butte and the Tom Long Creek in their efforts to initiate true creative partnerships with the Ukiah District.

Sincerely,



Douglas Fir

RESPONSE TO COMMENT LETTER 405

- 405-1 The basic parameters and guidelines established by SYU-13 Timber EIS are not changed and are incorporated into the DEIS for each alternative. The establishment of old-growth reserves to be incorporated into the Resource Area's Old-Growth Reserve System, the amount of old-growth habitat acres devoted to spotted owl pairs and herbicide use on public lands are referred to specifically in the FEIS. See pp. 1-8 for existing and ongoing decisions incorporated by reference.
- 405-2 The DEIS incorporates by reference several documents that carry over existing decisions, guidelines and policies. Where feasible these documents are attached as appendices, paraphrased for the readers clarification or specifically referenced. It's unfortunate that every document the Bureau produces cannot instruct the reader fully in all the management principles involved. The Final EIS has been refined to clear up inconsistencies in the text.
- 405-3 The scoping period was conducted between March and May of 1986 with the major issues being identified by the public, state and local governments and the BLM. Other concerns such as watershed and soil protection, minerals and recreation were addressed in the DEIS but were no emphasized in the management alternative formulation and impact analysis.
- 405-4 See comment 405-3.
- 405-5 See comment 405-1. The amount of old-growth habitat being disposed/retained has been changed in the Final EIS. The analysis of this disposal or retention is contained in Chapter 4. Each alternative including the preferred alternative incorporates by reference the basic timber management parameters found in SYU-13 EIS/ROD as stated on p. 1-7. There is no need to 'reaffirm' this under each alternative.
- 405-6 The intent of the Existing and Ongoing Decisions Incorporated By Reference section p. 1-7,8,9 is not a list of mutually exclusive actions that are totally compatible with the preferred alternative. For example, ongoing decision #5 that calls for public lands to be managed to protect a variety of resources, does not preclude land disposal or timber harvest if these actions meet environmental guidelines and clearances. The FEIS designates 5 significant old-growth reserve areas and 4 ACEC/RNAs to preserve natural values. Explanation of the designation or non-designation as old-growth reserves appear in the text where appropriate. See responses 473-9, 417-11 and 442-3 and p. 1-4, FEIS.
- 405-7 The parcels in which you refer (Bear Buttes and Harris) are two tracts identified for disposal using existing

land use plans (Red Mountain and Scattered Tracts MFP) and were part of our ongoing land exchange program. The management area maps will be corrected to reflect private ownership. Section 19 of T. 5 S., R. 5 E., will be added to the land use descriptions in Chapter 2, pages 2-59,65.

- 405-8 Examples of 'non-consumptive' recreational uses have been added to the FEIS text for clarification. See response 520-3 on explanation of the Enhancement of Natural Values Alternative.
- 405-9 The impacts you mentioned have been addressed in Chapter 4, Environmental Consequences. See Impacts on Availability of Timber to the Market and on Spotted Owls/Other Old-Growth Values. A majority of the land acres to be disposed will be transferred to the USFS, for continuation of multiple use management.
- 405-10 The reasoning behind disposal of various tracts of land located throughout the Resource Area is contained in each of the alternative descriptions for each management area and also in the preferred alternative (if applicable) rationale for each management area. Specifics of land acquisition by management area are contained in the analysis of the management situation (AMS). See response 165-3 for additional information on the AMS.
- 405-11 Old-growth tracts have been analyzed using a set of rating criteria developed over a five year period (1981-86) and which was used along with public input to select significant old-growth tracts to be included in the Resource Area reserve system (see response 165-4). 'Small' islands of mature trees will be analyzed on a case-by-case basis. Some will possibly be disposed, others will be retained. Also see responses 165-3,4, 473-9, 520-5.
- 405-12 See response 405-3.
- 405-13 The full range of public participation has been carried out during the DRMP/DEIS process. This has consisted of public scoping analysis, public workshops and hearings, written public comments, as well as involvement by various study groups during drafting of the FEIS. A good portion of the make up of these study groups consisted of concerned citizens and various members of conservation groups.
- 405-14 See responses 473-9, 520-5, 165-1.

July 6, 1988

29900 Highway 20
Fort Bragg, California 95437

ARA-407

Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, California 95521

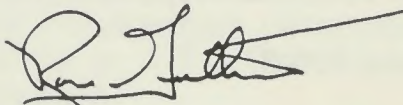
Arcata Resource Area Draft Plan

Dear Sir:

I have reviewed the Draft Arcata Resource Area Plan and find that none of BLM's proposed alternatives for managing this resource area come even close to protecting the values of these valuable public lands. I recommend modifying the plan and its management alternatives to include the following:

- 1) Wilderness status for all roadless lands, especially Red Mountain, Canto Peak, Brush Mountain, Elkhorn Ridge, Gilham Butte, and all of the King Range BLM-managed area;
 - 2) No action in any roadless area that will adversely affect its wilderness characteristics and values;
 - 3) Preserve all old-growth in the Arcata Management Area and take all other management action necessary to protect old growth dependent wildlife species;
 - 4) No off-road vehicles at Manila and Samoa Dunes. These vehicles are incompatible with protection of fragile ecosystems and rare plants. Protect the plants in these dunes.
- No ORVs.

Please keep me informed.



Ron Guenther

RECEIVED
JUL 08 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Daniel G. Cohoon
3820 Rohnerville Rd
Fortuna, CA 95540

ARA-412

June 29, 1988

Mr. John Loyd
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

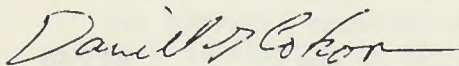
Dear Sir:

I am writing this letter in response to proposed Arcata Resource Area Management Plan options put forth for BLM lands in northern California. I would like to go on record as supporting the multiple use of BLM lands, including but not limited to, commercial timber harvesting. I feel that the option which allows for the consolidation of federal lands into manageable units and the promotion of good timber management is a wise and prudent use of our resource.

The setting aside of major portions of these lands as preserves serves only a small sector of the public interest and is a very poor utilization of the public's land resource.

The timber resource of the area is steadily being reduced by special interest groups setting aside parks and preserves. The removal of additional lands from multiple use and prudent timber management could have a drastic effect on the over all economy of the area.

Sincerely,

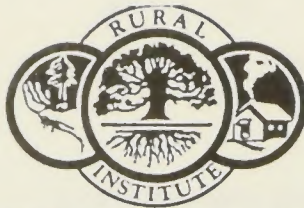

Daniel G. Cohoon

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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

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JUL 01 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA



ARA-417

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JUL 07 1988

ENVIRONMENTAL DEFENSE NETWORK

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

July 4, 1988

P.O. Box 1551, Willits, Ca. 95490

To: Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, Ca. 95521

Re: Comments on Draft Arcata Planning Area Resource Management Plan
and Environmental Impact Statement, December, 1987

The Draft Resource Management Plan (DRMP), as written, is totally inadequate in the following ways:

1. The "NO ACTION" alternative for Samoa Dunes is not a true No Action alternative since it proposes to build a 125 acre ORV facility. A NO ORV alternative should have been evaluated. | 417-1
 2. The "narrow corridor" location proposed for ORV's in the Manila Dunes is not identified. | 417-2
 3. No disclosure of the resource values that will be lost as a result of the disposal of 62% (77,360 acres) of the Arcata Planning Area. | 417-3
 4. No disclosure of how peregrine falcons on private land near Eden Creek and Mina will be impacted by disposal of some of their foraging area as proposed by DRMP. | 417-4
 5. No disclosure of the future status of spotted owls residing at Hulls Creek which will be disposed of. Will this pair be written off or relocated? | 417-5
 6. No disclosure of the net loss of old-growth habitat if RMP is adopted. | 417-6
 7. No explanation of how resource protection and enhancement can be achieved through disposal to non-Federal entities (p. 2-73) | 417-7
 8. No assessment of cultural resources and no plans for preserving them. | 417-8
- The DRMP does not provide adequate specific information to give the public and decision makers enough information to effectively consider the impacts of the proposed actions. | 417-9

The following DRMP proposals are totally unacceptable:

1. Samoa Dunes 125 acre ORV facility & Access Corridor on Manila Dunes.

The Peninsula is an area of rare habitat types and provides suitable habitat conditions for the Menzies' wallflower, a state-listed Endangered Species and candidate species for Federal designation.

The proposal to drastically increase ORV impacts (8000 visitor's days to 17,000) will significantly affect the rare, fragile dune habitats.

BLM should abandon its present ORV proposals and phase out ORV use altogether on the Samoa Peninsula.

2. Clearcutting and other "Even-Age" adventures in the Lacks Creek area. | 417-10

The Lacks Creek Management Area is within the hydrographic basin of Redwood Creek, and under Public Law 95-250 shall be managed to minimize sedimentation.

The Lacks Creek Management Area includes old-growth, mixed evergreen stands which are representative of low-elevation Douglas-fir forest in the North Coast Range. This major ecosystem is rapidly being logged to extinction in northwestern California.

BLM is the major land holding agency with an opportunity to preserve this remnant habitat in biologically significant units large enough to sustain the major life components of the community.

The DRMP fails to consider the scarcity of this habitat type as required by the Federal Land Policy and Management Act of 1976 (Sec. 202 (c)(6)). | 417-11

The northern spotted owl was located in the Lacks Creek area during the Nature Conservancy inventory in 1983, yet the Preferred Alternative proposes intense logging with no provision for preserving spotted owl habitat as required by law. | 417-12

Lacks Creek should be managed for wildlife habitat, watershed protection, biological diversity, and scientific research. It should be withdrawn from the timber production base and included in a BLM Old-Growth Reserve System.

3. Liquidation of nearly two thirds of the entire Arcata Planning Area.

The DRMP/EIS proposes the liquidation of 77,360 acres of public land without disclosing to the public what resource values will be lost as a result of this disposal. | 417-13

The fact that scattered tracts are difficult to manage, makes them all the more beneficial to the public in the long term. Unmanaged scattered tracts offer valuable ecological values worthy of protection - fish, wildlife, watershed, biological diversity, preservation of gene pools, etc.

The DRMP proposes to dispose of several areas which were inventoried for inclusion in an Old Growth Reserve System by Katherine Barrows (1983, 84, & 85). This directly contradicts the Old Growth Forest Reserve System Management Recommendations made in Katherine Barrows' 1985 report.

Gilham Butte, in particular, is well suited as an old-growth reserve since it is large (1320 acres) and has extensive stands of old-growth vegetation and a representative diversity of associated vegetation types.

417-14

We demand that BLM establish a "meaningful" Old-Growth Reserve System in the Arcata Planning Area which includes Gilham Butte, Butte Creek, Cedar Creek, Lacks Creek, Iaqua Buttes, White Rock Creek and the Northern California Coast Range Preserve. Full consideration should also be given to Davis Creek, West Larabee, Salt Creek, Charlton Creek, White Slide, Halls Creek, Signal Ridge, Doty Creek, Willis Ridge, and Mill Creek as additions to the Reserve System.

417-15

We also demand that BLM develop an adequate spotted owl management plan for public review based on current scientific information on habitat needs and demographic characteristics of the northern spotted owl. The management effort should be coordinated with the U.S. Forest Service, other public lands agencies, and private land owners to set aside a minimum of 2500 acres of suitable habitat for each pair of spotted owls as recommended by the 1986 Audubon Advisory Panel report. This plan is particularly critical today considering the unprecedented levels of old-growth liquidation and the devastating aftermath of the 1987 wildfires.

417-16

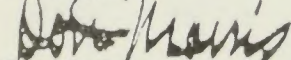
We also feel that BLM has failed to adequately assure the public that valuable cultural resources will be identified and protected. BLM should embark upon a comprehensive, systematic inventory of cultural resources on BLM lands and develop a management plan for public review.

417-17

We recommend that BLM manage timber production lands for "All-Age, All Species" using selection or small group selection harvesting techniques, and NO HERBICIDES. If this system is used, the Arcata Area BLM won't need to use the "genetically manipulated" super trees being developed for BLM lands in Oregon. The super tree is an abomination and a risky gamble that could eliminate naturally evolved, site-adapted trees from our forests.

417-18

Sincerely,



Don Morris, Coordinator

RECEIVED
JUL 0 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

cf Arcata

ARA-414

June 12, 1988
P. O. Box 589
Salmon Creek Road
Miranda, California 95553

To: Bureau of Land Management
Re: Arcata Resource Mngmt. Plan & EIS

My name is Harry Vaughn and I have been a lifelong resident of Humboldt County California. As the Arcata Planning Area Resource Management Plan and Environmental Impact Statement concerns this area I would like to express my opinions concerning this plan. In regards to the Samoa Peninsula Management Area I would prefer to see the Enhancement of Natural Values Alternative selected. This dune environment is fragile and negatively impacted by unregulated use of off road vehicles. I personally feel that a 125-acre developed and posted off road vehicle park located on the Samoa Peninsula

should be sufficient to fill the recreational needs of the off road vehicle owners. I feel the dune ecosystems warrent protection and thus should be designated as a Research Natural Area/Area of Critical Environmental Concern.

Regarding the Lacks Creek Management Area I would prefer to see the No Action Alternative implemented. This would allow some timber removal for market while protecting valuable oldgrowth coniferous habitat concurrently. I believe oldgrowth habitat must be maintained for future generations enjoyment and scientific research. This alternative would designate an 1800-acre candidate oldgrowth reserve as a Research Natural Area/Area of Critical Environmental Concern for the preservation of oldgrowth values in the Lacks Creek area. I believe boundries of oldgrowth reserves when designated should be posted. I think this area should be monitored for Spotted Owls.

The Butte Creek Management Area is especially vital to the future of the Northern Spotted Owl as it is presently being utalized as a breeding area for this species. It has been reported that this area contains four breeding pairs of Spotted Owls. Since you have stated that Bureau Manual 6840 states , in part, "The fundamental objective is to maintain or increase current population levels of sensitive animals" it would seem that you are obligated to implement the Enhancement of Natural Values Alternative. This area is vital to the maintenance of genetic variability so essential to the survival of the Northern Spotted Owl. Studies and past experience have indicated that timber removal for its market value and oldgrowth habitat requirements for the Northern Spotted Owl are incompatiable. I believe in time we will come to realize that maintaining this species existance for future generations is in our best interest at the present time.

Concerning the King Range Vicinity Management Area I believe the alternative for Enhancement of Natural Values should be adopted. Consistancy with the existing King Range Management Program must be ensured. This alternative also calls for the enhancement of watershed conditions an visual quality of coastal streams. I fully support these concepts and practices by your

agency.

In regards to the Red Mountain Management Area I would prefer that the No Action Alternative be adopted. This plan only calls for disposal of 2000-acres as opposed to the 3000-acre disposal called for in the Enhancement of Natural Values Alternative. I believe this area has a great potential for riparian habitat and anadromous fisheries enhancement program development. I have been working with the Eel River Salmon Restoration Project now for three years. This program is largely funded through the Commercial Salmon Stamp Program. For the last three years now we have trapped, spawned and reared Wild South Fork Eel River King Salmon stock and released some of these fish each of the past three years into Twin Rocks Creek, tributary to Rattlesnake Creek, Southeast of the town of Legget. This portion of the South Fork Eel River contains promising spawning areas for the establishment of self sustaining populations of these fish. This is a truly renewable resource given good spawning grounds as exist in this area. This "crop rotation" takes between three to five years before the adult fish return to the spawning area where they formerly lived as juveniles. A large sport fishery has recently been sustained in this area by the success of the salmon and steelhead in the South Fork Eel River which is encompassed in this management unit. This sport fishery has greatly helped the local economy during the wintertime. Many out-of-work people find this employment opportunity welcome during this otherwise slow part of the season and would rather work as river guides than draw unemployment as they would otherwise. This resource also helps support the local offshore commercial fishery and the payroll that it generates. As a member of the Eel River Salmon Restoration Project I look for potentially under utilized stream reaches that have the potential for supporting anadromous fisheries and this area has great potential for producing this renewable resource in greater bounty than it does already.

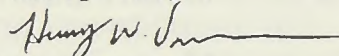
For the Covelo Vicinity Management Area I would prefer to see you continue to manage the remaining resources, with emphasis on the natural values of Eden Creek and the Eel River corridor. I ask that you designate Eden Creek as a Research Natural Area/Area of Critical Environmental Concern. I also agree that you should pursue cooperative management/agreement/interagency agreement with the U.S. Forest Service for efficient management of this management area.

I am very concerned about the scattered tracts management areas. I live in the Salmon Creek Watershed. Gilham Butte is located in the headwaters of this drainage and is very important to the maintenance of this watershed, as headwall failures affect all downstream values. This area is highly erosive and logging in this headwall area could negatively impact the Salmon Creek Drainage. I have been actively working to restore salmonid habitat in the Salmon Creek drainage and activation of landslides in the Gilham Butte area would be counterproductive to my efforts. I have talked to many people who strongly feel that Gilham Butte should be maintained as an oldgrowth reserve. This view was expressed unanimously at the public hearing you held in Garberville, California last month. Spotted owls are also known

to utalize this area and as such it is an important wildlife area. I therefore have to support your No Action Alternative which calls for retaining Gilham Butte, Iaqua Buttes and all of the areas in the Clear Lake Resource Area. This alternative also calls for aquireing about 800 acres in the Gilham Butte area for recreational uses. This alternative calls for the designation of Gilham Butte and Iaqua Buttes as Research Natural Areas/Areas of Critical Environmental Concern for the preservation of oldgrowth values. I strongly endorse this position. I also endorse your plan to aquire easments and construct a trail between Humboldt State Redwoods Park, Gilham Butte and the Kings Range National Conservation Area.

In closing I would like to thank you for accepting my comments regarding the Arcata Planning Area Resource Management Plan and Environmental Impact Statement. I strongly feel that oldgrowth management reserves are in the public interest. It is obvious to me that oldgrowth coniferous forests are becoming more precious with the passing years in this area as logging has reduced these reserves to a small amount of what just a few years ago existed. New logging systems technologies introduced in the late 1930's to the current time have allowed an accelerated rate of logging and processing of the logs removed from the forest. While I realize the importance of the logging industry to the local economy I also realize the importance of the fishing and tourism economies. Healthy watersheds and forests are directly related to the health of these industries.

Thank you,
Harry Vaughn



P.O. Box 589
Salmon Creek Road
Miranda, Calif. 95553
(707) 943-3233

RESPONSE TO COMMENT LETTER 417

- 417-1 The 'No Action' alternative as applied to every management area discussed in the PRMP/DEIS, refers to continuation of the present management direction. It is not intended to be a no activity alternative for total preservation of resources. See response 520-1.
- 417-2 The narrow corridor referred to in the DEIS has been changed to specific closure areas in the FEIS. These areas are described on pp. 2-5 and 2-18 and referred to in Chapters 2 and 4, Samoa Peninsula Management Area.
- 417-3 The impacts on resources from land disposal has been analyzed in Chapter 4 of the FEIS.
- 417-4 Specific impacts to resources that exist on adjacent private lands will be addressed during site specific environmental assessment/land reports completed on all proposed disposal actions. See response 306-5.
- 417-5 Latest inventories done in 1987 and reflected in the FEIS show only individual male owls in the Hulls Creek Area. The impacts for disposal actions have been addressed in Chapter 4, FEIS.
- 417-6 Impacts on old-growth values are addressed. See Preferred Alternative under Cumulative Impact Section, Impacts to Spotted Owls and Other Old-Growth Values and Table S-1, Comparison of Alternatives: Cumulative Summary.
- 417-7 The statement on p. 2-73 refers to disposal to the State of California as part of the State In-Lieu Selection process. It assumes that through state forest practices and Fish & Game regulations resource protection and enhancement can occur.
- 417-8 A description of cultural resources by management area is contained in Chapter 3 of the DEIS. No blanket inventory of cultural resources exist in the Resource Area. All actions proposed on public lands require a cultural inventory/clearance. An extensive cultural inventory was conducted for the SYU-13 1981 Timber EIS for the proposed Ten Year Timber Plan. Preservation of cultural resources and/or mitigations to protect these resources are applied on a case-by-case basis.
- 417-9 The alternatives and management actions proposed by the DRMP/EIS are structured to address the significant issues that exist in the planning area. The affected environment description and environmental consequences are directly based on these specific issues.
- 417-10 No clearcutting is proposed for the Lacks Creek management area. See Appendix 2-1, on SYU-13 Timber Harvest Parameters and Silvicultural Guidelines.

- 417-11 The PRMP/FEIS establishes 5 major old-growth reserves and designates 4 of them as Research Natural Areas (RNA)/Areas of Critical Environmental Concern (ACEC). These designations are in addition to the two RNA/ACECs already established by previous planning efforts to preserved old-growth and other natural values. Also see response 442-2.
- 417-12 An 800 acre old-growth reserve area will be established by the PRMP/FEIS and removed from the timber production base to provide habitat for old-growth dependent wildlife species, including the northern spotted owl. Before timber harvest activities can begin on lands identified for timber production, clearances for threatened and endangered plant and animal species are required.
- 417-13 See response 417-3.
- 417-14 Gilham Butte, based on clarification of data acquired in 1985 and new information received from public input during the DRMP/DEIS stage has been recommended for old-growth reserve status and designated an RNA/ACEC in the FEIS. Also see response 165-8.
- 417-15 See response 417-11.
- 417-16 The BLM spotted owl areas are being coordinated with adjacent USFS spotted owl habitat areas and a Memorandum of Understanding has been signed with the U.S. Fish and Wildlife Service on information collection and dissemination as well as overall spotted owl management coordination. See p. 3-3 of the FEIS.
- 417-17 See response 417-8.
- 417-18 See Appendix 2-1, p. A-6,7 that describes the silvicultural harvest systems to be employed in SYU-13. This type of silvicultural system emphasizes natural regeneration first by the very nature of the 'Managed Old-Growth' system employed. The two stage shelterwood/seed tree cut techniques allow natural regeneration to only be supplemented by artificial regeneration when stocking levels are not met.

PETITION FOR THE ESTABLISHMENT OF A PERMANENT
O.R.V. FACILITY IN THE EUREKA AREA

ARA-430

WE THE SIGNED PETITIONERS ARE CONVEYING TO ALL LOCAL & GOVERNMENT AGENCIES THAT WE FEEL THERE IS A REAL & IMMEDIATE NEED FOR A PERMANENT O.R.V. PARK TO BE ESTABLISHED IN THE EUREKA AREA. AN O.R.V. PARK SHOULD PROVIDE ADEQUATE SPACE FOR THE NUMBERS OF PEOPLE WHO WILL BE USING IT, & AS DIVERSIFIED TERRAIN AS POSSIBLE TO PROVIDE FOR THE YOUNG & BEGINNER AS WELL AS OLDER MORE ADVANCED USER. WE BELIEVE AN O.R.V. PARK IS A NECESSARY FACILITY TO PROVIDE PEOPLE WITH THE PLACE TO ENJOY THEIR FORM OF RECREATION WITH THE LEAST IMPACT & HASSLES FOR THE USER. A PARK WOULD GO A LONG WAY TOWARDS HELPING TO PREVENT UNWANTED VEHICLE USE IN AREAS WHERE THAT TYPE OF USE IS NOT COMPATIBLE. ORV USERS PAY TAXES THAT HELP BUY PUBLIC LANDS, PROVIDE MANAGEMENT SALARIES ETC. SO THEY HAVE A RIGHT TO HAVE A PLACE FOR THEIR SPORT.

WE UNDERSTAND THAT THE BLM IS IN THE PROCESS OF STUDYING THE FEASIBILITY OF AN ORV PARK FOR THE SOMOA-MANILA DUNES NEAR EUREKA. WE ASK YOU TO FAVORABLY CONSIDER THIS & WORK WITH BLM ON ESTABLISHING AN ORV PARK.

IF THE AREA DOES NOT MAKE SOME KIND OF COMPROMISES FOR THIS FACILITY HUMBOLT COUNTY & EUREKA WILL CHASE AWAY THE USERS, LOSING REVENUES & OR SPREAD OUT VEHICLE USE TO OTHER AREAS WHERE SUCH USE MAY NOT BE AS ACCEPTABLE & CONTROLLABLE. PUBLIC LANDS ARE FOR PUBLIC USE & A PLACE SHOULD BE MADE FOR ALL.

ARA-435

July 11, 1988

Dear Sirs;

I am 100% accord with your plans to trade your land locked parcels for parcels that can be added to your existing large holdings. From a management standpoint it's the only way to go. Land-locked parcels only benefit the contiguous land owners, large BLM holdings benefit everyone.

Sincerely yours,
Vernon R. Bonham

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JUL 14 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Defenders OF WILDLIFE

July 9, 1988

ARA-442

Al Wright, District Manager
Ukiah District Office
U.S. Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482

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JUL 13 1988

John Lloyd, Area Manager
Arcata Area Office
U.S. Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Re: Arcata Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS).

Dear Sirs:

Defenders of Wildlife submits this letter as our comments and recommendations on the above-referenced DRMP/DEIS. Please consider our input, and include this letter in the appropriate public record.

At the outset, we are greatly disappointed with BLM's preferred alternative described within this DRMP/DEIS. We believe that implementation of this preferred alternative would destroy critically important old-growth timber stands and dependent wildlife species, deny wilderness suitability recommendations for deserving roadless areas, encourage off-road vehicle use despite threats to rare plant species and other natural values, and otherwise jeopardize wildlife and habitat resources.

For example, we are appalled that this DRMP/DEIS generally ignores recommendations to protect old-growth timber stands, and to revitalize and implement the Old-Growth Reserve System. BLM's preferred alternative would dispose of or place in timber production most of the old-growth timber areas which were originally intended to be included within this Old-Growth Reserve System. For example, Gilham Butte, Lacks Creek, and Iaqua Buttes were originally recommended in the 1986 Nature Conservancy Report for inclusion within the Old-Growth Reserve System, but instead BLM is recommending these areas for disposal or timber production.

442-1

Similarly, BLM does not propose setting aside sufficient, contiguous blocks of old-growth habitat to maintain spotted owl pairs.

442-2

CALIFORNIA OFFICE: 5604 ROSEDALE WAY, SACRAMENTO, CALIFORNIA 95822 • (916) 442-6386
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

This is an egregious failure, and, if successful, will only serve to hasten the federal listing of the spotted owl as a threatened or endangered species.

BLM's cavalier attitude toward old-growth habitat protection is also distressing, given the continuing cumulative loss of these habitats. Less than 5% of the original old-growth coniferous forests remain on the Pacific Coast. These forests are being logged much faster than they can regenerate. This is timber "mining," not timber management.

We urge BLM to abandon its preferred alternative. Instead, we recommend that an alternative be prepared, adopted, and implemented which will effectively protect and retain all existing old-growth habitats within the Arcata Management Area. All of the 1986 Nature Conservancy Report recommendations should be implemented for including deserving areas within a meaningful Old-Growth Reserve System. Old-growth territories to maintain spotted owl pairs must be substantially expanded beyond 300 acres. No existing spotted owl territories should be subject to logging or disposal.

442-3

We further recommend that BLM find the Red Mountain, Cahto Peak, and Gilham Butte roadless areas "suitable" for Congressional wilderness designations. We believe that these roadless areas qualify for and need wilderness designation. In the interim, BLM should not allow any activities which would jeopardize the primitive integrity of these roadless areas.

442-4

Finally, we recommend that BLM substantially reduce the availability of its public lands for off-road vehicle uses. For example, we oppose the projected increase in off-road vehicle use at Samoa Dunes. While we support and appreciate efforts to fence wetlands and habitats for the Menzie's wall flower, these efforts will probably not mitigate for increased off-road vehicle habitat losses and enforcement problems generally. Given the overall history of cut fences and enforcement difficulties vis-a-vis off-road vehicle uses, we believe it is a mistake to attract and encourage such uses in the vicinity of wetlands and other sensitive habitats. These concerns also apply to the proposed off-road vehicle uses at the Manila Dunes.

442-5

Again, please abandon BLM's preferred alternative, and instead prepare, adopt, and implement an alternative which will effectively protect old-growth habitats, wilderness areas, and sensitive wildlife species and habitats.

RESPONSE TO COMMENT LETTER 442

- 442-1 See response 481-4. The Preferred Alternative for Lacks Creek has been changed in the Final EIS to establish an 800 acre Old-Growth Reserve Area and designate it an RNA/ACEC.
- 442-2 The entire Butte Creek Management Area has been set aside to protect four viable, breeding pair of spotted owls (2,500 acres). In addition, over 9,000 acres have been or will be proposed by the FEIS/PRMP as RNA/ACEC to protect old-growth, spotted owls and other natural values.
- 442-3 The Preferred Alternatives recommended by the FEIS, establishes five old-growth reserves that are of sufficient size and location to produce a 'meaningful' old-growth reserve system within the Arcata Resource Area. Also refer to comments 520-6, 417-11.
- 442-4 See response 517-5.
- 442-5 See response 520-1.

Box 666
Trinidad, CA 95570
July 10, 1988

Area Manager
Bureau of Land Management
P. O. Box 1112
Arcata, CA 95521

ARA-445

Dear Area Manager:

My primary and overwhelming comment on your December DEIS for the Arcata Management Area is that none of your alternatives adequately protect the lands under your jurisdiction. I am particularly disturbed that none of the alternatives for the forested areas offer substantial preservation of old growth timber resources.

445-1

Similarly, all of your "alternatives" with regard to off-road vehicle use state that "ORV use will be... enhanced"--I guess the "alternative" is how much enhancement? There are four major unsavory aspects of ORV use which should have been considered in your draft:

1. Noise pollution, especially in proximity to residences as in the Manila Dunes area.
2. Increased litter.
3. Physical danger to passive users, both from speed of vehicles and attitudes of drivers.
4. Destruction of vegetation and of the dunes themselves in the Manila Dunes area.

Any one of these four factors would warrant at least controlling this form of "recreation" which precludes any other use of the areas in question.

445-2

Sincerely,

C. Page
C. Page

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JUL 11 1988

RESPONSE TO COMMENT LETTER 445

- 445-1 The FEIS preferred alternative for seven management areas protects 60% of the studied old-growth reserve acreage in the Resource Area. The Scattered Tracts, Butte Creek, Red Mountain and Lacks Creek management areas all protect substantial acreage of old-growth.
- 445-2 Although all alternatives for the Samoa Peninsula management area provide opportunities for off-road-vehicle (ORV) recreation, only one alternative states that ORV use will be enhanced.

Each alternative provides specific protection of known sensitive habitats in the Samoa and Manila areas and offers a level of control of ORV use.

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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

CERTIFIED



the **Northcoast
Environmental
Center**

July 13, 1988

ARA-449

John Lloyd
Arcata Resource Area Manager
Bureau of Land Management
16th and J Streets
Arcata CA 95521

RE: Arcata RMP/DEIS

Greetings:

These are our comments on the changes you have proposed for the Resource Management Plan for the Bureau of Land Management's (BLM's) Arcata Planning Area and Draft Environmental Impact Statement (DEIS).

The Northcoast Environmental Center, established in 1971, is dedicated to illuminating the relationships between humankind and the biosphere. Towards that end, the Center provides environmental information and referral services to Northwestern California, publishes the monthly ECONews and operates a library open to the public. The Center, through its members and affiliates, represents the efforts of approximately 3,500 people. Member groups of the Center include the North Group of the Redwood Chapter of the Sierra Club, the Redwood Region Audubon Society, the North Coast Chapter of the California Native Plant Society, Californians for Alternatives to Pesticides, the Siskiyou Mountains Resources Council and other groups with a keen interest in assuring that human activity does not impair the aesthetic or biological abundance of natural systems in California's northwest.

These comments are intended to complement and supplement those of our other member groups that have submitted comments on the RMP/DEIS.

AFFECTED ENVIRONMENT:

This section seems too reductionist in its approach to be an adequate discussion of environment. The overall regional context of the old growth forest habitats and dune habitats should be better described if a remote decision maker is to appreciate the serious nature of the environmental destruction that has gone on in the area.

449-1

The "REGIONAL PERSPECTIVE" begins with a discussion of the spotted owl that includes little in the way of quantification. How many pairs of these rare creatures are thought to exist? How many pairs of the birds are to be found in the Arcata Resource Area? What are the habitat characteristics of this area that supports these birds? What other species are linked to these characteristics? What are the trophic relationships and general flow of energy and nutrients in this habitat we call old growth. What are the linkages between terrestrial and aquatic components of the old growth forest ecosystem? What "services" do we all receive from this ecosystem?

449-2

A key feature of the old growth habitat is coarse woody debris (CWD) (as defined in Advances in Ecological Research Volume 15, 1986: Ecology of Coarse Woody Debris in Temperate Ecosystems, and herein incorporated by reference).

879 NINTH STREET • ARCATA, CA 95521
(707) 822-6918 (KEEP TRYING)

What is the amount and distribution of CWD in the old growth system, what are the functional aspects of this material in old growth forests? What is the regional distribution of the old growth forest type? What was the general "prehistoric" distribution of the old growth forest type? What percent of the original cover is represented by BLM ownerships within Arcata Planning Area? How does the BLM define old growth? What is the rate at which the old growth forest is being logged off in California's northwest?

449-3

It seems to us that answers to these questions are a must if any informed decision can be as to the disposition of your old growth tracts. And we request that a moratorium on any actions by BLM that could reduce the area of old growth forest in the Arcata Planning Area (APA) be put into effect until the above questions can be answered by the agency.

Until that time comes then the Gilham Butte, Butte Creek, Big Bend, Cedar Creek, Lacks Creek, Iaqua Buttes, White Rock Creek, and the Northern California Coast Range Preserve should all be managed to retain their old growth forest characteristics and other lands in the APA with old growth should also be placed under a similar moratorium.

449-4

RANGE OF ALTERNATIVES:

We don't think that the BLM has presented an adequate range of alternatives to the public or the decision makers. All of the four alternatives displayed permit the "management" at degrees of intensity that are "more or less" the same. We suggested in our scoping comments that certain scattered tracts near state and federal parks be consolidated or managed for their ecological values by the nearby agency. We haven't seen this concept discussed in the DEIS and we feel that it should be. Gilham Butte and Lacks Creek are two such areas.

449-5

SAMOA DUNES:

Where land use activity might potentially cause irreversible, harmful or unacceptable cumulative effects on fragile habitats within your jurisdiction, the BLM should adopt policies of non-degradation and restoration.

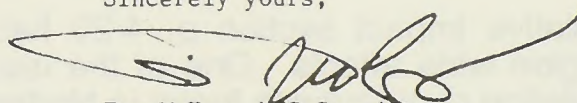
Surely, the proposed Off-Road Vehicle park on the Samoa Spit would fit into a category of unacceptable cumulative effects, because of its nearness to the Mensie's wallflower and the small remaining areas of rare natural dune habitat. My sense of NEPA and the ESA suggest that the spirit of environmental law is best served by reserving the widest range of management options through the EIS process.

449-6

Several of our member groups are on record as having requested you to defer action on the ORV park until a final EIS and notice of decision has been released to the public for the RMP--and we join them in this request.

Thanking you in advance for your cooperation, I am

Sincerely yours,



Tim McKay, NEC Coordinator

cc:

Assemblyman Dan Hauser
Congressman Doug Bosco
Senator Pete Wilson

RESPONSE TO COMMENT LETTER 449

- 449-1 The affected environment section of a RMP/EIS is not intended as a 'text book' treatise to cover every aspect of the environment and all the possible dynamics involved. The section is intended to offer a good foundation in order to discuss environmental consequences of the proposed management alternative.
- 449-2 Due to the absence of any centralized data base in California quantification of total spotted owls in this region is not valid. The DEIS contained the latest information on pairs of spotted owls in the Resource Area and this information is updated in the FEIS. See Chapter 3, Old-Growth Characteristics and Chapter 4, Impact on Spotted Owls and Other Old-Growth Values. Detailed information on old-growth characteristics and their relationship to spotted owls and other old-growth related species as well as energy interreactions in this type of ecosystem are contained in the SYU-13 Timber EIS (1981), pp. 3-17-26; pp. 4-12-24,27,28 and in the analysis of the management situation, Old-Growth Reserves (1986). See comment 165-3.
- 449-3 Again, a good deal of old-growth habitat dynamics is contained in Chapter 3 and 4 of the SYU-13 Timber EIS. Obtaining additional information on old-growth habitats in the Arcata Resource Area is the next step of the old-growth reserve system being set up by the management actions identified in the PRMP/FEIS. Five old-growth reserves plus the Northern California Coast Range Preserve will be studied by the BLM and a multidisciplinary study group to determine management guidelines and information to be obtained from these areas. See pp. 1-4 FEIS for list of reserves to be studied.
- The cumulative impact section p. 4-20 has been expanded to include region wide effects. One of the issues discussed is the rate of depletion of old-growth forest in Northwestern California.
- 449-4 See comments 449-3 and 520-3,4,5.
- 449-5 The range of alternatives for each management area are intended to cover the major issues that presently exist and do not necessarily cover the full spectrum of choices from total protection to total consumption. When the management direction for a certain management area or tract of land is determined, details of who best to manage the resources effectively and efficiently can be discussed. Co-op management plans involving Gilham Butte and Lacks Creek have been discussed with adjacent landowners, including State Parks and Redwood National Park, respectively.
- 449-6 See p. 2-4, FEIS on the management direction on the Samoa Peninsula. With present Menzies Wallflower population

fenced, and wetland areas closed by barriers/signs, and official closure of 240 acres from ORV use, unacceptable cumulative effects will not occur. The past and present investment and use by various user groups and the environmental protection afforded sensitive habitat preclude the 'widest range' of management options on the Samoa Peninsula. Also, see responses 449-5, 520-1.

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JUL 15 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

ARA-456

45 Hillpark Avenue
Great Neck, NY 11021
July 12, 1988

Area Manager
Bureau of Land Management
PO Box 1112
Arcata, Calif. 95521

Dear Sir:

My friends asked me to write this letter for them, as well as for myself, therefore, please consider this as many letters, and not just one, and I will enclose herewith, a list of their names and addresses.

At this writing, we are very very concerned about your proposals in the following, and how we feel about them:

Red Mountain, Cahto Peak, and Gilham Butte, these must be protected to the fullest, for they belong to ALL OF WE AMERICANS, and NO ACTIONS SHOULD BE TAKEN IN THESE AREAS THAT WILL AFFECT THEIR WILDERNESS CHARACTERISTICS.

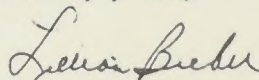
Old growth forests and species such as the spotted owl and others. are rapidly disappearing. All old growth in the Arcata Management Area SHOULD AND MUST BE PRESERVED.

ALL OFF-ROAD VEHICLES AND RARE PLANTS ARE NOT COMPATIBLE AT THE SAMOA AND MANILA DUES.

It is time, that your department started doing what you are supposed to be doing, protecting and preserving our LANDS AND OUR WILDLIFE. Stop giving in to the few minorities that have money and power behind them. Leave our wilderness alone, except if you want to help to preserve them and save them from the so called humans, who will only destroy what belongs to ALL AMERICANS.

We hope you will do all in your power to preserve our lands always and all ways.

Sincerely yours,



Enc.

MRS. Lillian Bieber and per

attached list of friends writing this letter with me.

General & Mrs. Bert Vandeventer	Valhalla, NY
Doctor Nathan Brody	Floral Park, NY
Mrs. Helen Fine	Floral Park, NY
Mrs. Marion Novin	Floral Park, NY
Dr. Alan Toffler	Floral Park, NY
Mr. & Mrs. L. Asen	Great Neck, NY
Mr. & Mrs. G. Roberts	Great Neck, NY
Mr. & Mrs. R. Rosenstein	Great Neck, NY
Mr. & Mrs. M. Bressack	Great Neck, NY
Mrs. Florence Klein	Great Neck, NY
Mrs. Anne White	Great Neck, NY
Mr. & Mrs. J. Jones	Arden, N. C.
Mrs. Sue Petersen	Asheville, N. C.
Mr. & Mrs. J. Aaronsen	Asheville, N. C.
Mr. & Mrs. S. Nevins	Baldwin, NY
Mr. & Mrs. S. Madigan	Glen Head, NY
Mr. & Mrs. G. Linsky	Glen Head, NY
Mr. & Mrs. T. Douso	Glen Head, NY
Mr. & Mrs. K. Nesky	Glenwood Landing, NY
Mr. & Mrs. R. Schildston	Locust Valley, NY
Mr. & Mrs. L. Farber	Syosset, NY
Mr. & Mrs. R. Ragazzi	Centerport, NY
Mr. & Mrs. L. Levin	Woodbury, NY
Mr. & Mrs. L. Lustig	Little Neck, NY
Mr. & Mrs. G. Schiller	Little Neck, NY
Mr. & Mrs. M. Kass	Flushing, NY
Mrs. Jerry Levitt	New York, NY
MRS. CONRAD NAGEL	New York, NY
Mr. & Mrs. F. Lefferman	W. Brookville, NY
Mr. & Mrs. D. Workman	BRADENTON, Fla.
Mr. Pat Brennan	Bradenton, Fla.
Mrs. Dorothea Hogarty	Pt. Richey, Fla.
Mrs. Madyline Sullivan	Mineola, NY
Mr. & Mrs. G. Gregario	Glen Cove, NY
Miss Susan Wilson	Pt. Washington, NY
Mr. & Mrs. L. Bukzin	Forest Hills, NY
Miss Anne McEvoy	E. Northport, NY
Mr. & Mrs. L. Liebowitz	Rego Park, NY
Mr. & Mrs. R. Ettingre	Bellmore, NY
Mrs. Marion Freeman	W. Hempstead, NY
Mr. Peter Yanello	Brooklyn, NY
Mrs. E. Dukes	Queens Village, NY
Mr. & Mrs. R. Kirwan	Lloyds Neck, NY
Mrs. Estelle Kfare	Pembroke Pine, Fla.
Mr. Neil Chernick	Los Angeles, Calif.
Mrs. Elizabeth Jacobson	Bronx, NY
Mrs. Jennie Fincher	Winston Salem, N. C.
Mrs. Lillian Farmiglette	Glen Head, NY
Mrs. Natalie Friedman	Scarsdale, NY.
Mr. & Mrs. B. Maurer	New Orleans, La.
Mr. & Mrs. R. Rubinestis	Commack, NY
Miss Helen Minugh	Great Neck, NY
Mr. & Mrs. B. Novin	Sewell, N. J.
Mr. & Mrs. E. Novin	Arverne, NY
Miss Phyllis Novin	Elmont, NY
Mr. S. Mills	San Francisco, Calif.
Mrs. Michael Dukas	San Francisco, Calif.
Mrs. Leila Gamble	Springfield Gardens, NY
Mr. & Mrs. S. Sands	Kings Park, NY
Mrs. J. Laguerre	Queens Village, NY
Mr. & Mrs. C. Mallow	Orlando, Fla.
Mr. & Mrs. Joel Silvers	Great Neck, NY
Mr. & Mrs. I. Jalamin	Great Neck, NY

July 12, 1988

ARA-458

To Mr. Al Wright-

We believe the BLM should continue its previous course of action and do as much as possible to consolidate and actively manage the Old Growth Reserve System. And not put into timber production those areas which were really intended to be part of the Reserve system.

Gilham Butte among the other Old Growth Reserve recommendations of the 1986 Nature Conservancy report should be conserved.

We note that your Draft RMP does not consider the environmental results of disposing of over half of those BLM lands in the Arcata Resource Area.

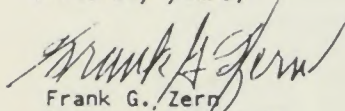
These lands are public lands and their management should always give precedence to long term public interest, and irreversible changes should be avoided. We are seeing evidence of the latter as we travel through this area and off the highway path.

The BLM should consider the quality of the soil beneath the surface in long term forest maintenance. After a few cycles of cutting we are finding that the soil does not respond as productively.

Soil and forest biologists and scientists are now pointing to the dying of European forests and advancing a possibly good reason: for the last two hundred years the natural recycling cycle has been broken and the forest soil is undergoing a possible irreversible change affecting any future productivity.

Short term expediency cannot be tolerated by the American public, on public land, for the public good. Old growth is non-renewable and so also is its associated complex unique natural eco-system!

Sincerely yours,


Frank G. Zern
411 West Edward St.
Santa Maria, Ca.
93454

cc Joan Hoyt

RECEIVED
JUL 15 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

CAHTO COALITION
P.O. Box 151, Leggett, California 95455

ARA-473

July 15, 1988

Bureau of Land Management
555 Leslie Street
Ukiah, California 95482
(Re: Draft EIS Arcata
Resource Management Plan)
Attention: Al Wright

RECEIVED
JUL 18 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Dear Mr. Wright,

The Cahto Coalition wishes to thank the BLM for this opportunity to comment on the Arcata RMP DEIS.

The National Environmental Policy Act requires every major Federal action to be accompanied by detailed statement that analyzes:

- 1) The environmental impact of the proposed action,
- 2) Any adverse environmental effects which cannot be avoided should the proposed action be implemented,
- 3) Alternatives to the proposed action,
- 4) The relationship between local short term uses of man's environment and the maintenance and enhancement of longterm productivity, and
- 5) Any irreversible and irretrievable commitment of resources which would be involved in the proposed action should it be implemented.

A programmatic EIS, such as this RMP, is usually developed to support broad policy determination, or overall national programs. As such, programmatic statements usually do not consider the impacts of decisions upon particular areas ("site specific impacts"). Such broad EIS's are normally sufficient since either the policy being considered does not result in site specific impacts or later environmental statements will consider the environmental impact of actions taken with respect to specific areas. See 40 CFR 1500.6(d)(1)1976; NRDC v. Administration (D.D.C.1974) 451 F. Supp. 1245,1258-1259; Kelly v. Butz(W.D. Mich. 1975) 404 F. Supp. 925,935; NRDC v. Morton (D.D.C. 1974) 388 F. Supp. F. 2d 1386,cert. den. 427 U.S. 913. BLM's proposals in this RMP DEIS are not solely programmatic. Its ongoing actions of disposal and timber sales require BLM to analyze thoroughly the effects on the environment since its decisions constitute significant federal actions and will result in site specific effects.

473-1

Merely stating that site specific environmental assessments will be made later does not explain current activities' effect on the environment. The adoption of this RMP by the BLM will have site specific effects that are not addressed in this DEIS.

Loss of the Wilderness option for the proposed Cahto Wilderness Area, loss of habitat for old-growth Douglas fir dependant wildlife species, effects on National Wild and Scenic Rivers (South and Middle Forks of the Eel River), must be addressed in this EIS since proposed and ongoing plans constitute irretrievable and irreplaceable commitment of resources.

473-2

The RMP should address the adverse impacts to the Wild and Scenic South Fork of the Eel due to timber harvesting and road building in its immediate headwaters, Elkhorn Ridge and Brush Mt. The EIS must take in to account the requirements of the Wild and Scenic Rivers Act, specifically what effect timber harvesting and roadbuilding will have on the "Wild" designation of the S.F. of the Eel. See EIS for Federal designation of the S.F. of Eel (page S-9, 1-4, also Sec. 2(a)(ii) of the National Act

473-3

BLM has not even made a River Management Plan for the S.F. of the Eel as required by the National Act, yet will dispose of its immediate headwaters to the State Lands Commission without any restrictions concerning its use, which will include logging, roadbuilding, and disposal to private parties. This RMP must include an environmental analysis of the suitability of these areas, Elkhorn Ridge and Brush Mt., for in-lieu settlement with SLC. Also, the EIS should describe the effects of disposal to SLC of these areas on important Wilderness resources and their management within the Northern California Coast Range Preserve. BLM has already made a timber sale that will adversely effect the management of the Preserve and in known Spotted owl habitat, against its own policies on sensitive species. See Arcata RMP DEIS app. 2-4, p. A-19.

473-4

BLM in stated Final Intensive Wilderness Inventory, p.164, "If private lands between units CA-050-134(Elkhorn Ridge) and CA-050-135(Brush Mt.) ever become public land, BLM will study the area using current land use planning processes and wilderness will be one of the uses studied at that time." These areas were denied WSA status based solely on size and met all other criteria for such inclusion during Wilderness Inventory. The Interior Board of Land Appeals (IBLA 80-852, Heath Angelo, et. al.) has documented and verified that these areas also met the size exception outlined in the Wilderness Handbook, "Strong public support for inclusion", that policy still stands.

473-5

With the acquisition of lands along the State and Federal Wild and Scenic River, S.F. of the Eel, these areas now comprise over 10,000 acres of contiguous Public Land, which satisfy all criteria for its designation as a WSA. BLM, in its preferred alternative, proposes to add 900 acres to this area for the purpose of protecting riparian values, (See RMP DEIS, p.2-60). In a memorandum

from the Outdoor Recreation Planner, Bruce Cann, in Red Mt. MFP(CA-056) he states," The acquisition of private lands along the S.F. of the Eel River has enhanced opportunities for primitive types of recreation such as river rafting, kayaking, backpacking and sightseeing." Despite the BLM's own documentation of the importance of these lands for dependant old-growth Douglas fir wildlife species, wider ranging animals that use the NCCRP, (See SYU-13, DEIS, p. 4-54, App.4-2 & 4-3), and the need for the protection of the Wild and Scenic River, (Environmental Assessment, Exchange with Harwood Investments), they have made a timber sale on Elkhorn Ridge. The E.A. for this sale does not address the fact that the area is a known Spotted owl habitat nor does it analyze logging and roadbuilding effects on the Wild and Scenic River.

The BLM plans for the elimination of all old-growth forest habitat on Elkhorn Ridge and Brush Mt., (SYU-13, DEIS, p.4-70), yet refuses to assess the environmental effects on the wilderness values, old-growth Douglas fir dependant wildlife species, the integrity of the NCCRP, or the " Wild" designation of the S.F. of the Eel. BLM has proceeded with its timber management plans on these areas that constitute the immediate headwaters of this Wild River without completing a River Management Plan, in violation of the Wild and Scenic Rivers Act, NEPA and Migratory Bird Treaty Act, (See Plaintiffs' Memorandum in Support of Motion for Summary Judgment, pp.32-41, Portland Audubon Society v. Hodel, Civil Action No.87-1160-JU (D. Ore.)).

In the 10 years of our involvement with the BLM's planning process they have never inventoried Brush Mt. for wildlife or old-growth Douglas fir dependant species. BLM disregards its own documentation and refuses to make necessary inventories in its planning decisions. We can only conclude that BLM's decisions regarding these areas are irrational and arbitrary.

The BLM failed to give notice of the impending Timber Sale on Elkhorn Ridge, even though they knew of strong public interest in this area, to the Cahto Coalition, Redwood Chapter of the Sierra Club, Friends of the Earth, Committee to Save Our Public Lands, California Wilderness Coalition. The Timber Sale was scheduled for 1986, but the BLM announced, instead, that it was preparing a new RMP which would supercede all other management plans for this area. Despite this, BLM, 2 months before the release of the RMP DEIS, (Timber Prospectus, Elkhorn Ridge, Sept. 1987), proceeded with this Timber Sale, even though it did not have access to the area (and will not for 2 years). We can only conclude that the BLM did not wish to allow for any public involvement in this major Federal action.

The Cahto Peak Unit has always met the criteria for its inclusion in the Wilderness Preserve System. BLM's assertions that it does not provide for outstanding opportunities for primitive and unconfined recreation or solitude, given the BLM's extensive documentation of this area's State, National, and Worldwide unique

473-5

Wilderness resources, must be labeled as absurd, irrational, and arbitrary. BLM stated during Wilderness Inventory that private lands of the Nature Conservancy could not be considered, yet the BLM has considered TNC's ownership in every facet of BLM planning, save wilderness.

473-5

During "normal BLM planning", such restrictions are not mandated by BLM policies or FLPMA. In fact, BLM states that the Nature Conservancy is recognized as an agency to which the BLM can dispose of endangered, threatened and sensitive species habitat, (Arcata RMP DEIS, p. 1-8(11.)). BLM is full aware that TNC has been instrumental in acquiring and protecting lands that now comprise Federal Wilderness Areas through cooperation with the Federal agencies involved. BLM's actions to begin timber harvesting on lands surrounding the NCCRP constitute a major federal action requiring the performance of an EIS. BLM's failure to address the environmental consequences of its current and proposed actions on this Preserve may very well lead to Federal litigation, if not remedied in an EIS or this RMP DEIS.

473-6

Wilderness is an obvious and appropriate alternative that must be included in this RMP DEIS. Cahto Peak, Elkhorn Ridge, Brush Mt., (including the S.F. of the Eel), meet the statutory criteria for inclusion into the Wilderness Preserve System. We insist that a detailed site specific analysis of the environmental consequences of the loss of the Wilderness option and the adverse effects to these areas Wilderness character be included. If the BLM does not now address these issues in this RMP DEIS they will never be addressed. The BLM's decision not to include these concerns in this EIS constitutes an irretrievable and irreversible commitment of resources required to be assessed by NEPA.

In the past, these areas have been managed to preserve their wilderness qualities and public use of these areas has been of a type consistent with the land's Wilderness character. The BLM proposes to change the status quo in favor of development and disposal without any consideration of the reasonable alternative of Wilderness. The duty to address this in the RMP DEIS was triggered when the BLM proposed to change the status quo (Committee for Auto Responsibility v. Solomon (D.C. Car. 1979) 603 F. 2d 992, 1002-3). The great importance Congress placed on Wilderness and the affirmative duty of the BLM to consider it during BLM's planning process, combined with the fact that individual development projects in themselves may be major Federal actions, convinces us that Wilderness designation for the Cahto Wilderness Area must be addressed in this RMP DEIS (See e.g. Cady v. Morton (9th Car. 1975) 527 F. 2d 786, 796 (Application for approval of mining plan covering 770 acres); Minnesota Pub. Int. Res. Group v. Butz (8th Car. 1974) 498 F.2d 1314, 1323 (modification of existing contracts for logging in Boundary Waters Canoe Area); Wyoming Outdoor Coordinating Council v. Butz (10th Car. 1973) 484 F.2d 1244 (authorization of clearcutting on 670 acres); Kelley v. Butz (W.D. Mich. 1975) 404 F.Supp. 925 (chemical spraying of 84 acres); NRDC v. Morton (D.D.C. 1974) 388 F.Supp. 829, 834 aff'd without

473-7

BLM's Arcata RMP DEIS must include alternative of Wilderness for Cahto Peak, Elkhorn Ridge, and Brush Mt., (including the S.F. of the Eel). BLM's deletion of this alternative for these areas does not comply with the requirements of NEPA, Wilderness Act and FLPMA. Although all of these areas meet the statutory requirements to qualify for inclusion in the Wilderness Preserve System, the BLM has determined that a substantial majority of these areas should be developed and disposed of. The particular deficiency we allege is a failure on the part of the BLM to critically examine the effects of its decisions upon the Wilderness resources of these areas. BLM either never seriously considered the impact of its decisions on the Wilderness resources of these areas or that BLM has simply failed to disclose the data, assumptions and conclusions employed by it in such a consideration. The BLM has decided to surrender Wilderness values but does not reveal what it is giving up. BLM plans to develop the majority of these areas and dispose of them but does not describe what effect such development and disposal will have. Although NEPA requires full disclosure and public participation, the BLM has adopted a method of disclosure and public participation that effectively undercut the possibility of serious public participation in its decision making.

473-7

We would like to point out that the BLM is in error on page 1-5, RMP DEIS, by listing Cahto Peak, Elkhorn Ridge and Brush Mt. as WSAs. They were never designated as WSAs. Also, the BLM inference that alteration in Surveyors Canyon make Elkhorn Ridge unsuitable for Wilderness is false. Final Intensive Wilderness Inventory addressed the Timber Sale in Surveyors Canyon and concluded that it met the naturalness criteria for designation as a WSA (page 163). Further, the "Wild" designation of the BLM's ownership of the S.F. of the Eel denotes an area that is "essentially primitive", which meets the criteria for its inclusion in the Wilderness Preservation System.

473-8

It would be extremely helpful if BLM personnel would familiarize themselves with the BLM's own documents. The fact that none of BLM's personnel, including the Area Manager and the District Manager are aware of BLM's past actions in this area, does not speak well for their ability to manage Public lands.

SYU-13 DEIS, (See, pp. 3-21, 3-22, 3-32, 4-54, 4-55, 4-70, 4-71 (destruction of old growth forest is irreversible), app. 4-1, 4-2 & 4-3), describes the importance of BLM old-growth Douglas fir forest for the retention of dependant species as well as genetic diversity. Still, the BLM proposes in the RMP DEIS to dispose of important old-growth areas, in fact, has disposed of Davis Creek (T. 1N, R. 1W, secs. 8, 9 & 10), White Rock Creek (T. 22N, R. 14W, secs. 7 & 8), Salt Creek (T. 21N, R. 13W, secs. 14, 22 & 23), which represent known Spotted owl habitat. These disposal are not in keeping with the BLM's own policies regarding Sensitive Species (Arcata RMP DEIS, page A-19). The BLM has violated NEPA, FLPMA, the

473-9

istration Procedure Act and the Migratory Bird Treaty Act by sale of these areas. Considering that, BLM's ownership of old-growth Douglas fir forests are important areas for the retention of sensitive species and genetic diversity, these disposal decisions sent major Federal actions requiring the performance of an

473-9

BLM proposes to dispose of Gilham Butte in this RMP DEIS, yet private discussions with local conservationists BLM now proposes to include this area in its Old-Growth Reserve System. If the BLM believes that this area is worthy of retention for its important natural values, the area should be designated an A.C.E.C. We find no state or national BLM policy that delineates the actions or the parameters for an Old-Growth Reserve System. BLM does, however, allow for an area to be designated as an Area of Critical Environmental Concern if it contains important natural resources that need special management for its protection. We will insist that the BLM will give a full explanation in its RMP FEIS as to why that protection it is proposing for Gilham Butte. We insist that an ACEC alternative be given for all old-growth areas in BLM ownership. BLM should also fully describe what the environmental consequences of any disposal of old-growth areas, regardless of location (such as Tom Long Creek). BLM's documentation of its areas that contain old-growth Douglas fir forest is conflicting and incomplete. This lack of accurate details should be corrected in the FEIS. We believe that there are as many as 24 sites in the area containing old-growth Douglas fir forest in the Gilham Resource Area.

473-10

The Cahto Coalition strongly recommends that the BLM give serious consideration to, A Preliminary Proposal for Community Development of the Tom Long Parcel of National Resource Land, located in the Ukiah District in response to the RMP DEIS for the Gilham Resource Area. The BLM has always encouraged Public citizens to help in its resource management. We can only see that this proposal will be in the Public and National best interest. We applaud these Public spirited citizens in their actions and hope the BLM will follow their fine example in preserving the natural values of Tom Long Parcel.

This RMP DEIS does not explain fully why is it necessary for BLM to dispose of vast areas of subsurface mineral rights held in the United States. It also does not explain the environmental consequences of their disposal. Merely stating that later environmental assessments will be made for each individual disposal does not address the obvious site specific consequences proposed in the DEIS. BLM must provide the Public and its Representatives adequate information to analyze BLM's proposals for disposal of subsurface mineral rights. We demand that the BLM fully disclose what it is proposing to give up and what effects will be expected to flow from its actions, in its FEIS.

473-11

BLM proposes to acquire up to 2,600 acres of land in the

Charlton Creek/Bell Springs watersheds for the propose of protecting Peregrin falcon nesting sites and foraging areas. We find this action admirable and support it but we also believe the BLM must inform us in this DEIS what other management actions they contemplate for these acquired lands such as possible timber production.

473-12

While the BLM states it will not reanalyze the management thrust of the Red Mt. ACEC/RNA, (RMP, DEIS, p.19), it is certainly necessary for the BLM to include in this DEIS all areas containing old-growth Douglas fir forest, since their importance is fully documented in SYU-13 DEIS. The value of the 863 acres the BLM is proposing for timber management in the Red Mt. WSA is much more valuable for its important natural values. BLM stated that this RMP DEIS will supercede the Red Mt. Master Framework Plan and therefore environmental consequences of activities on Red Mt. must be included in this DEIS. BLM cannot ignore the cumulative impacts to the management of the resources contained in the Red Mt. WSA in a DEIS that is proposing to manage all resources in the Arcata Resources Area. The Draft Activity Plan for the Red Mt. ACEC/RNA, prepared after the release of this RMP, cannot satisfy the requirements of NEPA, since it will not address fully the environmental consequences to old-growth areas, on a regional basis. We have tried to ascertain for many months now if, indeed, a Management Framework Plan for the Red Mt. Management Area does exist. So far, neither the District Manager or the Area Manager has any knowledge of a Red Mt. MFP. Regardless, BLM must take into account all old-growth Douglas fir forests in its ownership in the FEIS.

473-13

BLM states that there is a moderate potential for archaeological resources on Cahto Peak, Elkhorn Ridge, Brush Mt. and the S.F. of the Eel River corridor, (RMP DEIS, p.3-15). SYU-13 DEIS, (p.4-31), states, "The Native American sites inventory identified two significant sociocultural sites - Cahto Peak and the Pecwan tract." Cahto Peak is definitely an important religious site for the Cahto Tribe. BLM states in its Timber Sale Environmental Assessment, that artifacts were found and removed by BLM's archaeologist. It is a well known fact that Cahto Peak, Elkhorn Ridge, Brush Mt. and the S.F. of the Eel are part of the original homeland of the Cahto Tribe, this would also include Red Mt. We must insist that the BLM inform the Cahto Tribe of the finds on Elkhorn Ridge. We can fully understand why the BLM would not publish such information. Richard Keating of the Lowley Museum in Berkeley is working with the Cahto Tribe in preserving their heritage and we are certain that any find in these areas would be of great interest to him. We would also strongly urge the BLM to honor the request of the Cahto Tribe for access onto Cahto Peak, that they may be able to go to important cultural and religious sites.

473-14

On behalf of the membership of the Cahto Coalition,

Michael Huddleston

Michael Huddleston, Chairman

RESPONSE TO COMMENT LETTER 473

- 473-1 Specific environmental effects of timber harvest have been addressed in SYU-13 Timber EIS. Site specific impacts are addressed through individual environmental analyses. The Resource Area's exchange/disposal program and it's effects on the environment are addressed with a site specific environmental analysis and land report.
- 473-2 The 'wilderness option' for the proposed Cahto Wilderness area, loss of habitat for old-growth Douglas-fir dependent wildlife species as well as wild and scenic river concerns have all been addressed in the FEIS, either specifically or by reference to existing documents. See p. 1-5,6,7 and Chapter 4, Impacts of Spotted Owls and Other Old-Growth Values.
- 473-3 An activity level management plan for the wild and scenic river will be done in the next year. The management plan will consider what management actions will be appropriate within the river corridor while protecting it's wild character. Also, see response 481-5.
- 473-4 The State Lands Commission (SLC) has expressed an interest in all revenue producing lands the BLM manages. Although certain lands within the Arcata Resource Area meet the State's criteria for selection, they have not made formal application for any in-lieu entitlements covered by the RMP/EIS. An environmental assessment of the suitability of disposal will be addressed at the time of formal application. See response 481-5.
- 473-5 See response 517-4.
- 473-6 All actions involving the Northern California Coast Range Preserve (NCCRP) have been analyzed and coordinated with TNC. The Elder Creek ACEC, SYU-13 Timber EIS and the Elkhorn Ridge environmental analysis are examples of documentation that address environmental consequences and public participation/involvement that took place. This includes specific TNC involvement.
- 473-7 See responses 517-4 and 517-5 and pp. 1-5, 1-6, 1-7 of DEIS.
- As noted previously, neither the BLM nor IBLA agree with the Cahto Coalition on this matter. From the government's perspective, due process was observed, the regulations for implementing the Wilderness Act were followed and the Cahto Peak, Elkhorn Ridge, and Brush Mountain areas found wanting in wilderness values, as defined by the Act.
- 473-8 The text has been rewritten in the FEIS to reflect these changes. The criteria for a 'wild' river designation in the Wild & Scenic River Act has no bearing on the naturalness or primitive criteria as used in the Wilderness Act.

- 473-9 The importance of old-growth Douglas-fir forest in the Ukiah District has been evaluated since the 1981 Timber EIS recommended 18 original old-growth reserve to study. Five major old-growth reserve areas are being proposed by the FEIS/RMP and four will be designated to protect old-growth values such as old-growth dependent species and genetic diversity. See p. 1-4 FEIS and responses 417-11, 442-3.
- 473-10 See response 520-5.
- Environmental consequences of disposal of any identified old-growth area has been described in Chapter 4, Impacts To Spotted Owl and Other Old-Growth Forest Values. Documentation of the Resource Area's old-growth reserve areas has been clarified in the FEIS. See p. 1-5 and Table 3-1, p. 3-5, Old-Growth of 300 Acres or More in the Arcata Resource Area.
- 473-11 The disposal of subsurface minerals is strictly an administrative action if and when the land within certain management areas are disposed. The analysis of disposal of surface and subsurface resources will be done during the site specific environmental assessment process if and when the disposal action takes place. See response 473-1.
- 473-12 Lands acquired by the Bureau of Land Management will be managed according to FLPMA for sustained yield and multiple use. Specific protection of habitat or endangered species will be addressed through activity plans.
- 473-13 Environmental consequences of the Red Mountain Management Area are addressed in Chapter 4 of the DEIS. Cumulative regional impact analysis is contained in the FEIS, Chapter 4. (Site specific management proposals for the Red Mountain RNA/ACEC have been addressed in the Draft Red Mountain ACEC Activity Plan and Environmental Assessment, 1987.) The Management Framework Plan (MFP) for the Red Mountain/Scattered Tracts area does exist at the Arcata Area Office and was the basis for development of the ACEC designation for the Red Mountain area.
- 473-14 Archaeological resource information within the Resource Area are continuously being updated through inventories and Native American contacts related to site specific projects. Although it has been known for a considerable time the importance of the Cahto Peak area to the Cahto Tribe, we are presently working with the Cahto tribe in obtaining additional information for the Elkhorn Ridge-Brush Mountain area.

The Nature Conservancy

California Field Office
785 Market Street, San Francisco, California 94103
(415) 777-0487

ARA-480

July 15, 1988

RECEIVED
JUL 18 1988

Mr. John Lloyd
Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

RE: Arcata Resource Area Draft Management Plan

Dear Mr. Lloyd:

Thank you for the opportunity to comment on the draft Resource Management Plan and Environmental Impact Statement for the Arcata Resource Area. This letter sets forth our comments with regard to the alternatives proposed for the Samoa Peninsula Management Area.

As you know, The Nature Conservancy has been active in dune management on the Samoa Peninsula for over a decade. We currently own and manage the Lanphere-Christensen Dunes Preserve, 343 acres of dune lands north of the Manila Dunes Parcel identified in the Plan. In addition, the Conservancy has offered to provide management for approximately 80 acres of dunes owned by the City of Eureka which adjoin the Samoa Dunes Parcel. A principal purpose of our efforts on the Samoa Peninsula has been to provide protection for the endangered Menzies' wallflower. Our concern with the draft Resource Management Plan is to ensure that the selected alternative provides maximum protection for this species.

The Manila Dunes Parcel contains approximately 25 acres of habitat for the Menzies' wallflower. This parcel also contains a population of over 500 plants which may be genetically significant due to their isolation from other larger populations. The Manila Dunes Parcel and our preserve are components of a single, continuous ecosystem. Accordingly, the Manila Dunes Parcel is biologically very important to the long term viability of the Lanphere-Christensen Dunes Preserve. However, the plant community which supports this species currently is threatened by off-road vehicles and the spread of dune-stabilizing exotic plants.

The Samoa Dunes Parcel also is of critical importance to the preservation of the Menzies' wallflower. The Bureau's Rare Plant

Western Regional Office, 785 Market Street, San Francisco, CA 94103
National Office, 1800 North Kent Street, Arlington, Virginia 22209



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Protection Area contains over 4,500 individuals. Together with the approximately 2,500 plants in the adjoining 80 acre site owned by the City of Eureka, this site contains the largest remaining population of this species. Both of these populations are threatened by the spread of exotic species, and management of the two parcels should be consistent.

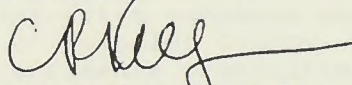
Because of the importance of the Samoa and Manila Dunes parcels to our objectives on the Samoa Peninsula, The Nature Conservancy would be willing to consider an acquisition of the Manila Dunes Parcel and the 40-acre Rare Plant Protection area through the Recreation and Public Purposes Act process. (Alternatively, the entire Samoa Dunes Parcel may be conveyed to another appropriate public or non-profit agency.) This can be accomplished under the Administrative Adjustments Alternative of the Plan, subject to the following changes in this alternative.

While we believe that in conjunction with our management of the Lanphere-Christensen Dunes Preserve we can fulfill the resource condition objectives of the Administrative Adjustments Alternative, we could not satisfy those conditions with respect to off-road vehicle recreation. We do not feel that off-road vehicle use on the Manila Dunes Parcel, or the narrow corridor proposed for this parcel, is compatible with the effective stewardship of the elements we are trying to protect within the Lanphere-Christensen Dunes Preserve. The inclusion of a narrow corridor would significantly increase the difficulty in managing and protecting the dune and plant communities found on the Manila Dunes Parcel and the Lanphere-Christensen Dunes Preserve.

480-1

Accordingly, we would recommend that the Administrative Adjustments Alternative be amended to exclude off-road vehicle use. As amended, The Nature Conservancy would support this Alternative and would be willing to participate in the acquisition of the land proposed for disposition.

Sincerely,



Christopher R. Kelly
Director
California Land Protection

CRK:rap

cc: Al Wright, District Manager
Bureau of Land Management
555 Leslie St., Ukiah, CA 95482
Steve Johnson, TNC San Francisco
Andrea Pickart, TNC Arcata

RESPONSE TO COMMENT LETTER 480

- 480-1 See response 520-1 in relation to exclusion of ORV use on the Samoa Peninsula. A county wide regional ORV use plan has been started and the extent of ORV use on BLM public lands will be based on this county ORV use plan after it's completion. See pp. 2-4 and 2-5 of FEIS. Therefore, the No Action Alternative which allows ORV use on Samoa Dunes and limited use on Manila Dunes would be the best course of action until the region wide county plan is finished. The selection of a complete disposal alternative at this stage of the overall Samoa Peninsula management process, we feel would not serve the publics best interest.

James C. Owens
4977 Jacoby Creek Road
Bayside, CA, 95524
July 16, 1988

Mr. Al Wright
Ukiah District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, CA, 95482

RECEIVED
JUL 18 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Dear Mr. Wright,

I am writing to comment upon your Arcata Resource Management Plan. Prior to this date I have attended or spoken at several public hearings or comment opportunities. I appreciate this last chance to register my opinion of your RMP.

My wife and I are the proud parents of three girls, ranging in age from seven months to seven years old. Prior to my eldest child's birth, we marveled at the opportunities to share the beautiful beaches nearby with our child. Both of us walked the beaches, roamed the dunes, and looked forward to introducing our new family member to the wonders of nature. After an absence from this area of several years, we returned to Humboldt County, with two small children. Straight away we headed to North Spit, to show our girls the entrance to the Bay. And straight away we were confronted with ORV's roaring around the spit, ripping up the dunes, speeding down the beaches, and generally blasting hell out of our plans for a special introduction to our local ocean beaches.

Mr. Wright, I am of the opinion that there is no need for any accommodations of four-wheel-drive vehicles on Samoa Spit, or anywhere else on the beaches of Humboldt County. Years ago the County Supervisors passed an ordinance prohibiting four-wheel-drive vehicles from all beach and dune areas except the wave slope below the high tide mark. That prohibition still stands, and is as necessary now as it was when it was promulgated.

481-1

The beaches and dunes on Samoa Spit are not the place for ORV's. Over two thousand miles of miles of roads and special trails are available for ORV's in the Six Rivers National Forest. Many miles of beachfront are available to ORV's in Oregon and other parts of California. Even in Humboldt County, ORV's can be found on all but a few miles of beach.

In light of the pressure being brought to bear upon your office from organized ORV users, I would like to speak for a group which has no legal standing, few organizations, and only unpaid, volunteer spokespersons. That group is the children of

July 16, 1988

Humboldt County, and elsewhere, who have the right to expect a safe, peaceful, non-threatening experience at the beaches on Samoa Spit. Our children have the same right of access to the ocean beaches, and freedom to utilize these beaches for their own enjoyment as anybody else in our county, yet they have been given little recognition in your planning.

In my experience, the presence of ORV's make the beaches and dunes of Samoa Spit unsafe for anybody on foot, let alone a family containing small children. I have had to pull my girls from in front of a speeding ORV on the Samoa beaches more than once, and have had to stand guard in order to prevent four-wheel-drive pickups from endangering them while they played in the sand, oblivious to a threat they obviously did not expect on the sunny beaches of the Pacific Ocean.

My recommendation is that you abandon your present plans calling for a 125 acre ORV facility on Samoa Spit, and an ORV access corridor through the Manila Dunes. Instead I recommend that you participate in the land-use planning effort proposed by the Humboldt County Board of Supervisors, before you commit any funds to the construction of ORV facilities on the Spit.

481-2

I would also like to register my surprise at your plans to dismantle the Old Growth Reserve System, decreasing the number of Old Growth areas from the original 21 Old Growth Douglas Fir areas, to two such areas. These remote, rugged old growth areas offer necessary, and increasingly rare habitat for a variety of animal and plant species. Instead of trading these lands away, and allowing them to be liquidated in a short-sighted management scenario, you should instead keep them, protecting their integrity, and maintaining them for a future when private old growth holdings will have disappeared. Your agency should be acting as stewards of these areas, not as auctioneers.

I recommend that you actively pursue consolidation and management of the Old Growth Reserve System. Moreover, I recommend that you implement the management recommendations proposed by the Nature Conservancy in its 1986 report to your agency. I recommend further that the Gilham Butte and Cahto Peak areas be designated as Wilderness Study Areas.

I do not understand your plans to road and log the Cahto Peak area. In 1961 you recommended the Cahto Peak lands as a study area of an undisturbed wilderness watershed. Since that time your agency and the Nature Conservancy have cooperated to manage this watershed, and it has been designated a National History Landmark and an Area of Critical Environmental Concern. As late as 1976, the BLM sought wilderness protection for this area, yet in your present RMP you propose abandoning your past course of action in favor of destroying the very wilderness values you have previously sought to protect.

481-3

I recommend that you designate the Cahto Peak area as a wilderness, and continue to manage this area in cooperation with the Nature Conservancy in order to protect the yet undisturbed drainage basin of the South Fork of the Eel River. Though the heart of this wilderness area is protected by the Nature Conservancy's holding, the surrounding area controlled by your agency includes a valuable buffer zone for the upper slopes of this wilderness watershed. Again, I advocate that your agency should act as a steward for this unique area, rather than a partner in its destruction.

Finally, I protest your plan to dispose of the Gilham Butte area, instead of designating it as an Old Growth Reserve. Gilham Butte has several perennial water sources, including Salmon Creek and tributaries of Westland and Gilham Creeks. Your agency has never undertaken a systematic survey of the flora and fauna of this area; instead you have relied upon data gathered by the Nature Conservancy. Gilham Butte is valuable as an Old Growth Reserve in spite of its propinquity to Humboldt Redwoods State Park. The Park has old growth redwood trees, whereas Gilham Butte has old growth douglas fir trees. To equate the two types of trees is an exercise in ignorance and scientific chicanery.

481-4

The shape of the Gilham Butte area, its size (especially after the addition of 800 acres under the No Action Alternative), and the age of its trees make Gilham Butte an excellent candidate for the Old Growth Reserve System. Moreover its value as a wildlife habitat, supporting a number of indicator and rare species, is also excellent. In fact, Gilham Butte has a strategic location as a genetic dispersal island for many old growth dependent species because of its location near the old growth areas of the King Range.

I do not understand why you plan to allow the dispersal and logging of Gilham Butte when it sits at the top of several drainage areas which have undergone restoration, or are currently in the process of restoration for fish habitat and drinking water supplies. The Mattole River and Salmon Creek are fed by Westlund, Gilham, Grindstone, and Mattole Canyon Creeks, all of whose water quality would be very severely affected by logging on the steep slopes of Gilham Butte. Sedimentation would be especially destructive to the steelhead and salmon fisheries in Gilham, Westlund, Grindstone and Mattole Canyon Creeks.

Studies of the geology of Gilham Butte indicate that the soils there are very fragile, and logging would lead to excessive erosion, landslides, and reforestation problems. Why do you plan on dispersing this property, and thereby destroying any value it has once it is logged, rather than maintaining it in its present form, which has habitat, genetic, and wilderness values unmatched by any logged-over area?

I recommend that you retain Gilham Butte as an Old Growth

July 16, 1988

Reserve, and that you enhance its value by the acquisition of the 400 acres of unlogged land next to the northern ridge of Gilham Butte owned by Eel River Sawmills. The stands of old growth douglas fir in this adjacent property would increase the habitat area of Gilham Butte, and helps to meet previous recommendations by your agency to increase the size of Gilham Butte by 800 acres.

I find your draft RMP to be deficient in dealing with the environmental consequences of the disposition of over half of the BLM lands in the Arcata Resource Area. Without site-specific evaluations of the units designated for disposal, it is difficult to estimate the environmental impacts of your draft RMP. An example is the failure of your draft RMP to address the impacts of the proposed timber management in the Red Mountain Unit. Logging 10,646 acres in the watershed of the South Fork of the Eel River, a Wild and Scenic River, is bound to have an impact upon the river, and its Wild and Scenic attributes.

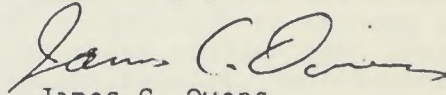
481-5

481-6

I recommend that your final RMP address the environmental impacts of your management upon the South Fork of the Eel River, including its Wild and Scenic characteristics. I also recommend that your RMP evaluate the environmental effects of all your proposed management scenarios, in explicit, comprehensive analyses.

Thank you for this opportunity to comment upon your draft Arcata Resource Management Plan. I look forward to an improved final RMP, with supplemental information provided as necessary to answer the concerns I've raised in this letter.

Sincerely yours,


James C. Owens

cc: John Lloyd

RESPONSE TO COMMENT LETTER 481

- 481-1 County ordinances on closures do not necessarily apply to Federal land. The BLM is required by Federal Land Policy and Management Act (FLPMA) to develop comprehensive management plans which include ORV use designations.
- 481-2 The ORV corridor has been dropped and limited ORV use proposed on the Manila Dunes area. We are required by FLPMA to be consistent with officially approved and adopted local plans and policies. Refer to pp. 2-4 and 2-5 of the FEIS.
- 481-3 In 1961 the BLM initiated a withdrawal of 3,600 acres of public land in the Elder Creek Watershed from mining laws and has since designated it as an Area of Critical Environmental Concern (ACEC). Since 1981 the BLM and The Nature Conservancy (TNC) have been jointly managing the area as the Northern California Coast Range Preserve. This area was included in the initial wilderness inventory in 1979, but did not meet the 2(c) criteria and was dropped from further study in the final intensive inventory decision in 1979.
- 481-4 The Preferred Alternative for Scattered Tracts area has been changed in the Final EIS, to retain Gilham Buttes and Iaqua Buttes and manage for their old-growth and watershed values (No Action Alternative).
- 481-5 Although the Draft EIS/RMP dealt with impact on timber availability to market and old-growth values as a result of disposal (see Chapter 4, DEIS), site specific environmental analyses will also be done to address specific concerns on each parcel being disposed/transferred within the Arcata Resource Area
- Impacts associated with logging within the Red Mountain unit have been specifically addressed in the 1981 SYU-13 Timber EIS.
- Road building and timber harvest are proposed for public lands within the South Fork Eel River watershed, but not within the Wild & Scenic River corridor which extends approximately a quarter mile on either side of the river. Harvest methods and mitigating measures will be in accordance with the guidelines and standards as outlined in SYU-13 EIS for timber management.
- 481-6 See response 481-5 above.

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JUL 18 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

ARA-482

9/13/88

TO: BUREAU OF LAND MANAGEMENT

FROM: WAYNE E. STEPHENS - LANDOWNER, MENDO.CO.
7900 MILSTEAD ROAD, GARBERVILLE, CA.

DEAR SIRs -

I AM SENDING THIS LETTER IN
RESPONSE TO THE ARCATA PLANNING AREA
RESOURCE MANAGEMENT PLAN.

I OBJECT TO THE DOCUMENT'S PLAN
TO DISPOSE OF THE TOM LONG PARCEL.

I WOULD LIKE TO SEE THE OLD
GROWTH RESERVE SYSTEM RE-ESTABLISHED
AND THE TOM LONG PARCEL MANAGED AS
AN OLD-GROWTH RESERVE.

I WHOLE-HEARTEDLY SUPPORT THE
TOM LONG WATERSHED ASSOCIATION'S PROPOSAL
TO MANAGE THE TOM LONG PARCEL UNDER
COMMUNITY MANAGEMENT.

SINCERELY,
Wayne E. Steph

ANOTHER AREA IN DANGER OF BEING CLOSED TO OFF ROAD VEHICLES

ARA-490

PETITION

We the undersign, hereby encourage the B.L.M. to accept and deliver the Enhancement of Recreational Values Alternatives. This being, opening an off road vehicles park at Samoa, opening a 40 acre area at Manila Dunes, and to let off road vehicles increase the use of area.

We totally oppose the No-Action Alternative, and the Enhancement Natural Values Alternative.

We also encourage looking into opening the whole dunes area, by purchasing private land and developing a large recreational area that would be unique in California. Example of above; Coos Bay Recreational area, Oregon.

PLEASE PRINT

- name address phone
1. CARL MOORE 1355 AIRPORT ROAD 707-795-1801
signature *Carl Moore* COTATI
 2. Rhonda Fix 7466 Bobbie Way R.P. 707-795-2210
signature *Rhonda Fix*
 3. Diana Bignasca 1905 Linda Pl S.R. 95403
signature *Diana Bignasca* FORESTVILLE
 4. BRENDA H. SPENCER 10590 RIVER DR 887-7801 (707)
signature *Brenda H. Spencer*
 5. DEAN MARTINELLI 1025 N DUTTON AVE SR. 8877123
signature *Dean Martinelli*
 6. _____
signature _____
 7. 6411 Jacqueline Robert Park Calif 707-585-2281
signature *Robert Spencer*
 8. 2338 Kippner DR S/R Ca 528-1751
signature *Nick Wampole*
 9. 2109 Mesa Way S/R Ca (95405) 525-7375
signature _____
 10. Mike Cahill 2361 Hard Ct
signature *Smth Ron - Cnc 95401 528-7320*
 11. Lennelle Edwards 2001 Pine Ct #262 SLOSA 95403

Mr. John Lloyd
B. L. M.
16th & J Street
Arcata, Ca. 95521

Dear Mr. Lloyd;

We just recently found out that B. L. M. is about to take more timber producing land out of Commercial use in Humboldt County. The area we heard about is the Gillham Butte area. Humboldt County cannot afford to have one more acre taken out of timber production. We would like you to take whatever steps necessary to keep Commercial Timber areas open for Commercial use in Humboldt County.

Thank-you,

Mrs. Audie Petrey
P.O. Box 74
Seaside, Ca 95565

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BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA



ARA-517

THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGION

July 18, 1988

Mr. John Lloyd
Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

RE: Arcata Draft Resource Management Plan and Environmental
Impact Statement

Dear Mr. Lloyd:

Thank you for providing a copy of the Arcata Resource Area's draft Resource Management Plan and EIS for our review. Because of our interest in management of public lands in the Arcata Resource Area, we would like to continue to receive all documents related to planning and all mailings related to wilderness and wilderness study areas.

Old Growth

BLM managed lands within the Arcata RA contain many stands of old-growth forest, an increasingly valuable resource in the United States. In recent years, management of old growth has become an important conservation issue throughout the nation. The old-growth forests of the Pacific Northwest are widely recognized as among the largest, oldest, and most ecologically diverse coniferous forests in the world.

Over the past two decades, understanding of the values of old-growth forests has changed dramatically. The traditional notion that those ancient forests are biological graveyards where valuable wood is wasting away has been replaced with an appreciation for their many benefits. Old-growth provided critical habitat for a large number of birds, mammals, reptiles, and amphibians, plus countless plants, insects and other invertebrate organisms.

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1791-A PINE STREET, SAN FRANCISCO, CALIFORNIA 94109 TELEPHONE (415) 771-2070
BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Old-growth has many additional benefits as well. It plays important roles with respect to water conservation, nutrient recycling, and forest growth in the Pacific Northwest. Old-growth can provide a natural defense against catastrophic wildfires. Recent studies have shown that old-growth forests harbor many more species of predators that feed on insect pests than do younger Douglas fir stands.

Only a small fraction of the old-growth forests that once covered the region has survived to the present. The continuing elimination of federally-owned old-growth is probably the single greatest threat to the nation's forest resources. On two of California's National Forests containing old-growth, the U.S. Forest Service is planning to log 40 to 60 percent of the remaining old-growth over the next 50 years. The reduction in old-growth forest proposed in the Arcata RMP only aggravates the negative impact of the Forest Services' proposed reductions. The RMP should consider the region wide impact of the reduction of this national resource and limit its liquidation of the old-growth resource. 517-1

The RMP should carefully analyze the long-term economic impact of reducing the old-growth inventory in the Resource Area. A high level of logging will likely cause economic problems for the timber industry. If the ancient forests and other mature timber stands are liquidated at rapid rates, both the quality and the quantity of timber in the region may decline precipitously. 517-2

The major competitive advantage the timber industry in the Pacific Northwest now enjoys is its supply of large, high quality timber. The large diameter timber is valued for clear, high-grade logs that are less costly to harvest and haul per unit than smaller timber. Once that supply is eliminated, so is the region's competitive advantage in an increasingly crowded marketplace.

Wilderness

At page 1-6 the Draft RMP states that since a portion of the South Fork of the Eel River was designated a wild river under the federal Wild and Scenic River Act, "this is all the consideration the area needs." The reasoning behind this statement should be outlined, because on the surface it makes no sense. Wilderness designation for the Cahto Peak, Brush Mountain, and Elkhorn Ridge WSAs and adjacent lands should be considered in the Draft RMP. 517-3

The Bureau's initial determination on the areas's opportunities for solitude or primitive and unconfined type recreation was based on size. The combined area of contiguous public land in the proposed Cahto Wilderness Area now amounts to more than 10,000 acres, because of the acquisition of the 517-4

river corridor after the 1979 Wilderness Inventory. The wilderness proposed by the Cahto Coalition should be considered in the Draft RMP. 517-4

Until the impacts of the RMP's proposed activities are adequately analyzed and considered, the wilderness values of Red Mountain, Cahto Peak and Gilham Butte should be preserved. 517-5

Alternatives

The selection of alternatives for review was inadequate in at least two instances. For the Red Mountain planning unit, the Enhancement of Natural Values and No Action Alternatives are essentially the same, which means the only alternatives considered were no action and a disposal alternative. The alternatives for the Covelo Vicinity unit are equally inadequate. Only two alternatives were considered for the Covelo unit, disposal and no action. 517-6

The alternatives requirement for EISs is the heart of the EIS. This requirement is intended to ensure that each agency decision maker identifies, evaluates, and takes into proper account all possible approaches to a particular project which would reduce environmental impacts. Such an all-or-nothing selection of alternatives, as considered for the Red Mountain and Covelo Vicinity units, is clearly insufficient to satisfy the National Environmental Policy Act.

Furthermore, the EIS fails to adequately address the impacts of proposed activities. For example, it is BLM's responsibility to ensure that its management decisions prohibit any degradation of water quality below that which is "necessary to support propagation of fish, shellfish, and wildlife and recreation." (40 C.F.R. Sec. 131.12(a)(2)). According to EPA, "if a planned activity will foreseeably lower water quality to the extent that it no longer is sufficient to protect and maintain the existing uses of the water body, such activity is inconsistent with EPA's antidegradation policy which requires that existing uses are to be maintained." (EPA, Questions and Answers on Antidegradation, No. 7 (1985)). Since logging and road building are one of the most significant sources of non-point water pollution, the RMP should carefully and completely analyze the impacts of proposed harvesting, especially in any watersheds that feed the South Fork of the Eel River. 517-7

Instruction Memorandum No. 88-511 states that BLM will "continue to analyze non-point source impacts on beneficial uses of water in resource management plans." This needs to be done in a detailed and comprehensive manner within the Arcata RMP.

RESPONSE TO COMMENT LETTER 517

- 517-1 We have expanded the cumulative impacts section in the FEIS, p. 4-21 to include region-wide effects.
- 517-2 We are required by the Federal Land Policy Management Act (FLPMA) to manage our timber resources on a long term sustained yield basis. The Timber Management Activity Plan developed for SYU-13 (1980 TEIS) outlined specific silvicultural harvest prescriptions, timber stand improvements and reforestation practices that will insure a sustained mature timber supply over the long time period. See managed old-growth (MOG) guidelines for SYU-13, Appendix 2-1, of DEIS. We have analyzed long term economic impacts of harvesting old-growth in the Resource Area in Chapter 4. See availability of timber to the market and impact on old-growth values sections in Chapter 4.
- 517-3 The section has been rewritten and a portion deleted, see p. 1-6 of the FEIS.
- 517-4 The original inventory determinations that none of these areas qualify as a WSA, were appealed to the Interior Board of Land Appeals (IBLA) and the State Director's decision was upheld. The acquisitions along the South Fork Eel River corridor are lands previously roaded and logged. Based on public comment on the Draft RMP, a wilderness evaluation of the acquired lands and the adjacent areas was done. Please refer to the FEIS p. 1-6 for an explanation of the findings.
- 517-5 Red Mountain is a WSA (CA-050-132), and is managed in accordance with the BLM Wilderness Interim Management Policy (IMP) until Congress acts on the wilderness recommendation. The State Director's decision that Cahto Peak and Gilham Butte do not qualify as WSA's is still valid. These two areas are managed in accordance with the existing management framework plan.
- 517-6 The alternatives for each management area were developed based on the issues identified in that area. In the Red Mountain management area, four alternatives were identified. There is a substantial difference between the No Action and Enhancement of Natural Values alternatives, namely the disposal of additional 1,000 acres, under Enhancement of Natural Values. In the Covelo management area, the only significant issue identified was land tenure adjustment. Two alternatives are adequate to address this issue in this management area - No Action and Administrative Adjustments.
- 517-7 Logging and road building as a source of non-point water pollution have been thoroughly analyzed in the 1980 SYU-13 Timber EIS. Mitigation and standard operating procedures have been incorporated in the RMP to minimize impacts. See Appendix 2-1 of DEIS.



California Wilderness Coalition

2655 Portage Bay East, Suite 5 • Davis, California 95616 • (916) 758-0380

ARA-520 July 17, 1988

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Friends Aware of Wildlife Needs
Friends of Plumas Wilderness
Friends of the River
Golden Gate Environmental Law Society
Granite Chief Task Force
Greenpeace
Isht Task Force
Keweenaw Group, Sierra Club
Keep the Seeps Wild Committee
Kern Audubon Society
Kern Keweenaw Chapter, Sierra Club
Kern Plateau Association
Kern River Valley Audubon Society
Kern River Valley Wildlife Association
Knappa Creek Section, Bay Chapter, Sierra Club
Lake Tahoe Audubon Society
Loma Prieta Chapter, Sierra Club
Los Angeles Audubon Society
Lost Coast League
Marble Mountain Audubon Society
Mann Audubon Society
Marin Conservation League
Mendocino Environment Center
Merced Canyon Committee
Mono Lake Committee
Monterey Peninsula Audubon Society
Morro Coast Audubon Society
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Placer County Conservation Task Force
Planning and Conservation League
Pomona Valley Audubon Society
Porterville Area Environmental Council
Redwood Chapter, Sierra Club
The Red Mountain Association
Salmon Trollers Marketing Association
San Diego Chapter, Sierra Club
Sea and Sage Audubon Society
Sierra Association for Environment
Sierra Trails
Sinkyone Council
Siakiyou Mountains Resource Council
South Ft. Trinity Watershed Association
South Fork Watershed Association
Stockton Audubon Society
Trinity Alps Group
Tulare County Audubon Society
U.C. Davis Environmental Law Society
The Wilderness Society
Wintu Audubon Society

Mr. John Lloyd, Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

Dear Mr. Lloyd:

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JUL 20 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

Thank you for this opportunity to comment on the draft Arcata Planning Area Resource Management Plan and Environmental Impact Statement (EIS).

The California Wilderness Coalition finds this EIS to be inadequate for a number of reasons cited below. We request that the Bureau of Land Management (BLM) correct these deficiencies and reissue a new draft EIS. Our specific comments follow:

No old-growth timber should be harvested anywhere in the Arcata Planning Area.

Samoa Peninsula: The range of alternatives considered is inadequate. The "Enhancement of Natural Values" alternative allows off-road vehicle (ORV) use to nearly double despite continued damage and trespass by ORV users. The EIS admits that "signs have been posted by local ORV clubs and BLM to prevent riders from traveling through these fragile areas. Most of the use occurs on long holiday weekends but light to moderate use occurs daily." This is not adequate protection of a sensitive plant species. The analysis of ORV impacts on endangered species, including brown pelican, southern bald eagle, Aleutian Canada geese, and American peregrine falcon is non-existent and must be part of this DEIS. An alternative must be developed that would eliminate ORV use from this area.

Lacks Creek: Considering the values here, especially the northern spotted owl, the only alternative that complies with BLM regulations and legal requirements is the "Enhancement of Natural Values" alternative. We support this alternative. Consideration should be given to transferring this land to Redwood National Park.

Butte Creek: Considering the values here, especially the northern spotted owl and goshawk, the only alternative that complies with BLM regulations and legal requirements is the "Enhancement of Natural Values/Preferred" alternative. We support this alternative.

520-1

King Range Vicinity: The range of alternatives considered is inadequate. The "Enhancement of Natural Values/Preferred" alternative allows logging in the future. Considering the values here, especially the anadromous fisheries and potential for replacement habitat for the northern spotted owl, an alternative must be developed and adopted that complies with BLM regulations and legal requirements for protection of old-growth species. This alternative should include the acquisition of land in the Jewett Ridge and Bear Creek areas for preservation, not for timber management purposes.

520-2

Red Mountain: The range of alternatives considered is inadequate. The "Enhancement of Natural Values/Preferred" alternative allows extensive logging on 22,100 acres of land. This is not "enhancement of natural values." Considering the values here, especially the northern spotted owl, southern bald eagle, and peregrine falcon, an alternative must be developed and adopted that complies with BLM regulations and legal requirements for protection of old-growth species. This alternative should include the acquisition of land as proposed but for preservation, not for timber management purposes. The Red Mountain, Cahto Peak, Brush Mountain, and Elkhorn Ridge areas should be recommended as suitable for wilderness designation.

520-3

Covelo Vicinity: The range of alternatives considered is inadequate. There should be an "Enhancement of Natural Values" alternative. Considering the values here, especially the northern spotted owl, southern bald eagle, and peregrine falcon, this natural values alternative must be developed and adopted to comply with BLM regulations and legal requirements for protection of old-growth species. Transfer to the U.S. Forest Service could be considered if these values would continue to be protected. Acquisition of the private inholdings in the Eden Creek RNA/ACEC should be a priority. The Eden Valley and Thatcher Ridge wilderness study areas must be studied for their wilderness character as part of a larger wilderness including Forest Service roadless areas; this entire *de facto* wilderness unit should be recommended as suitable for wilderness designation.

520-4

Scattered Tracts: The range of alternatives considered is inadequate. The "Enhancement of Natural Values" alternative allows disposal of old-growth forests. Considering the values here, especially the northern spotted owl and peregrine falcon, an alternative must be developed and adopted that complies with BLM regulations and legal requirements for protection of old-growth species. This alternative should include the acquisition of land as proposed but for preservation, not for timber management purposes. Gilham Butte and Laqua Butte areas should be designated as research natural areas and areas of critical environmental concern.

520-5

Page 1-4: In the DEIS, it is reported that The Record of Decision for Sustained Yield Unit 13 stated that "absent official guidance, a minimum of 300 acres was set aside for each pair of spotted owls." On Page 3-1 it is reported that home ranges for spotted owls in Oregon average 2,200 acres of old-growth forest and 5,000 acres in Washington. Should not the guidance for managing lands in the Arcata Planning Area be changed to reflect the need to protect larger spotted owl management areas?

520-6

Page 1-5: BLM is compounding their earlier error of not considering wilderness designation for the Cahto Peak, Brush Mountain, and Elkhorn Ridge areas. The original inventory determination that none of these areas have outstanding opportunities for solitude or a primitive and unconfined type of recreation was wrong then, and the decision not to consider the wilderness potential of these areas is wrong now.

520-7

Page 1-7: Incorporating by reference the "Yokayo Grazing Statement's Record of Decision" and therefore not analyzing the environmental impacts of grazing renders this EIS inadequate.

520-8

Page 1-7: The statement that "Eden Valley and Thatcher Ridge have no significant wilderness values or uses" is specious and self-serving. Public comment counters this pronouncement. Also, the wilderness values of the entire contiguous *de facto* wilderness have never been considered as a whole; the 55,000-acre wild area that has been dismembered into four units by the U.S. Forest Service and BLM requires a single wilderness study.

520-9

Page 4-3: Considering the lack of protection currently afforded to the botanical values of the area, a *realistic* analysis of the impact of botanical values should be reported.

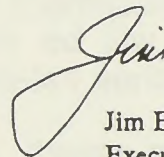
520-10

Page 4-22: If under the Preferred Alternative one of the area's spotted owls will be "displaced," to where will this unfortunate owl be "displaced?"

Page 4-23: Contrary to the EIS, the loss of 3,810 acres old-growth reserves is an irreversible action. Reclamation efforts elsewhere are laudable but do not alter the fact that 3,810 acres of old-growth reserves will be irremediably lost.

We appreciate this opportunity to comment on the draft Arcata Planning Area Resource Management Plan and Environmental Impact Statement (EIS).

Sincerely,



Jim Eaton
Executive Director

RESPONSE TO COMMENT LETTER 520

- 520-1 We do not feel a 'No ORV Use' Alternative is reasonable for this management area. The traditional use of the Samoa Dune area by off-road-vehicles (ORV) and the continued investment into this area from the State of California 'green sticker' fund would make total closure unreasonable. The Coastal Commission found that proposed recreation development in the Samoa Dunes area is consistent to the maximum extent practicable with the California Coastal Management Program. Sensitive plant and animal habitat has been fenced/closed to prevent ORV damage on both the Samoa and Manila Dunes. Vehicle use can be accommodated in other portions of the peninsula without significant environmental damage. As indicated in Chapter 3 of the DEIS, p. 3-6, the BLM lands are not critical habitat for the four endangered species. No analysis is included in Chapter 4 since no significant impacts are anticipated under any of the alternatives.
- 520-2 This management area does not contain significant amounts of old-growth for 'replacement habitat' for the northern spotted owl. The public lands will be managed to maintain natural values according to guidelines established by SYU-13 Timber EIS.
- 520-3 The significant old-growth areas will be protected under this alternative as outlined on p. 1-4 of the FEIS; however, the Enhancement of Natural Values Alternative does not imply total exclusion of other resource uses. Cedar Creek was the only old-growth reserve in the Red Mountain management area that was identified by the public and BLM as having significant old-growth values to preserve. Also refer to response 517-6.
- 520-4 As mentioned above and as outlined on p. 1-4 of the FEIS, Hulls Creek was the only old-growth reserve identified in the Covelo Management Area. Based on public input, BLM determined that this reserve did not meet the minimum criteria for old-growth reserve designation. The combined BLM/USFS wilderness issue was considered previously. Refer to p. 1-10, of the Eden Valley-Thatcher Ridge WSA FEIS.
- 520-5 The DEIS preferred alternative for scattered tracts has been changed in the FEIS to the No Action Alternative. Under this alternative Gilham Butte and Iaqua Butte will be designated Research Natural Areas/Areas of Critical Environmental Concern (RNA/ACEC) to protect old-growth and other natural values.
- 520-6 The Arcata Resource Area has no contiguous old-growth stands that are as large as 2,000 acres. Viable spotted owl habitat exist in this Resource Area in old-growth stands that are on the average, 300 acres in size. Breeding pairs of spotted owls are known to inhabit stands of this size.

- 520-7 See comment 517-4.
- 520-8 The grazing decisions made from the Yokayo Grazing EIS are not changed in the Arcata RMP. Neither the rangeland conditions nor livestock grazing use have changed. NEPA documentation is provided by the 1983 Yokayo Grazing EIS.
- 520-9 Text is revised to reflect current status of the wilderness studies. The combined BLM/USFS wilderness issue was considered previously: refer to p. 1-10 of Eden Valley-Thatcher Ridge FEIS.
- 520-10 The analyses considered reasonable foreseeable ORV use and its impacts on botanical values.

Resources Building
1416 Ninth Street
95814
(916) 445-5656
TDD (916) 324-0804

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

ARA-568

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management
Board
Colorado River Board
Energy Resources Conservation
And Development Commission
San Francisco Bay Conservation
and Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control
Board
Regional Water Quality
Control Boards

Mr. John Lloyd
Bureau of Land Management
Post Office Box 1112
Arcata, CA 95521

July 14, 1988

Dear Mr. Lloyd:

The State has reviewed the Draft Resource Management Plan and EIS, Arcata Planning Area, Humboldt and Mendocino Counties, submitted through the Office of Planning and Research.

We coordinated review of this document with the North Coast Regional Water Quality Control Board, Coastal Commission, State Lands Commission, and the Departments of Conservation, Fish and Game, Forestry, Parks and Recreation, and Water Resources.

The Departments of Conservation and Fish and Game have prepared the attached comments for your consideration.

The Coastal Commission indicates that it has sent its comments on this matter directly to you.

Thank you for providing an opportunity to review this document.

Sincerely,

A handwritten signature in cursive script, reading "Gordon F. Snow".

Gordon F. Snow, Ph.D.

Assistant Secretary for Resources

Attachments (2)

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 86012805)

Memorandum

Dr. Gordon F. Snow
Assistant Secretary for Resources

Date : APR 6 1988

District Manager
U.S. Department of the Interior
Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482-5599

Subject: DEIS and Resource
Management Plan for
Arcata Planning Area
SCH #86012805

From : Department of Conservation—Office of the Director

The Department's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Statement (DEIS) and the Draft Resource Management Plan (Plan) for the Arcata Resource Area and portions of the Clear Lake Resource Area, Humboldt, Mendocino, Trinity and Sonoma Counties, California. Our comments reflect a review of both documents and cover issues related to geology, mineral resources, slope stability, and erosion/sedimentation.

Specific comments are as follows:

1. In Chapter 3, Affected Environmental, the DEIS states for the Lacks Creek Management Area, pages 3-6, that, "...minerals are of little economic significance with very little chance of development in the near future." Similar statements about other management areas are found elsewhere in the DEIS. Nowhere in the document is there: 1) an in-depth discussion of the mineral resource potential of the region or specific areas; or 2) an explanation of the criteria and rationale utilized in determining "economic significance;" or 3) a relative scale of "chance of development." Without such information, a reviewer of the document cannot question, or support, the conclusions, recommendations or proposed actions presented. Therefore, we recommend that the Final EIS contain, as a supplement or as an integral component of the document, a comprehensive appraisal of the mineral resource potential of lands within the management area, along with a detailed discussion of methodology employed to classify or evaluate these lands.
2. The DEIS indicates in Determinations Not Made in This Plan, page 1)11 that, "...restrictions and stipulations for mineral development will be determined on a case by case basis." For general guidance, a policy statement addressing mineral property development and mined land reclamation is essential. We recommend, specifically, that the Final EIS contain a statement acknowledging the California Surface Mining and Reclamation Act (SMARA) as one of the laws controlling the administration and reclamation of mined land in this State.

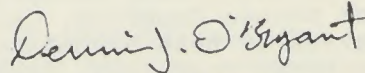
568-1

568-2

3. In Appendix 2)1, Sustained Yield Unit 13 Parameters, page A12, the statement is made that: "Each proposed timber sale and road network will be inventoried by a wildlife biologist at an early stage of planning." Considering the great propensity in this region for mass wasting and the severe erosion potential, we recommend that a parallel statement be incorporated in the Final EIS calling for a geotechnical investigation of each proposed timber sale. In addition, we recommend that the Final EIS contain a fully documented summary statement characterizing the extremely complex tectonic and petrologic framework of the region, as well as the landslide and slope stability problems of critical sites in specific Management Areas.

568-3

If you have any questions regarding these comments, please contact Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-2562.



Dennis J. O'Bryant
Environmental Program Coordinator

DJO:it
0048q/0001q

cc: Zoe McCrea, Division of Mines and Geology
Trinda Bedrossian, Division of Mines and Geology
Bob Streitz, Division of Mines and Geology

memorandum

1. ~~Projects Coordinator~~
Resources Agency

Date: July 11, 1968

2. John Lloyd, Area Manager
Bureau of Land Management
P.O. Box 1112
Arcata, CA 95521

From : Department of Fish and Game

Subject: SCH NO. 86012805, Bureau of Land Management (BLM), Draft Arcata Planning Area Resource Management Plan and Environmental Impact Statement, Humboldt, Mendocino, Trinity, and Sonoma Counties

The Department of Fish and Game (Department) has reviewed the draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the Arcata Planning Area. Although we favor portions of the RMP which recommend retention of habitat for old growth-dependent wildlife and the establishment of additional Areas of Critical Environmental Concern (ACECs) and Research Natural Areas (RNAs), these proposals fall short of the document's stated goal "of minimizing the decline of sensitive wildlife": p. A-20. For example, the preferred alternative recommends that less than half of the remaining 7280 acres of old growth be preserved. As a result, 40 percent of the known pairs of spotted owls and 16 percent of the known breeding pairs will be displaced (DEIS: p. 4-22). Since only a few islands of old growth remain in the coast range, including those found in protected redwood parks, and limited areas within national forests which are managed for old growth, it is important that more islands of habitat be preserved. For this reason we suggest that old growth at Gilham Butte and Laqua Buttes be protected. If proper surveys determine that the latter are found to be too small or fragmented to sustain spotted owls, we suggest that Thatcher Ridge and the Charlton Creek/White Slide area be considered as substitutes. We were pleased with the proposals for old growth management at Cedar Creek and Butte Creek.

568-4

The RMP also states that, "The objective of resource management planning is to maximize resource value for the public through a rational consistently applied set of procedures which promote the concept of multiple use management." The Department recognizes the multiple use objectives of BLM, but long-term protection of rare plant species and their habitats must not be sacrificed for short-term benefit derived from increased timber production or mineral extraction.

Of the several alternatives offered for each management area, we support those which maximize protection of rare plant habitats and unique areas of natural diversity. In all cases we oppose the Administrative Adjustment Alternative which would dispose of significant tracts of government lands without safeguards on management of rare species or unique habitats. The general language in the document concerning the future ownership and

management of these lands presupposes that they would be turned over to interests prepared to promote increased timber production. For the most part the Enhancement of Natural Values Alternatives would maximize BLM protection of plant communities and rare plant habitats and we support those alternatives.

We offer the following comments regarding the various management area alternatives:

Samoa Peninsula

The Samoa Peninsula is the site for several populations of the state-designated Endangered Erysimum menziesii (Menzies wallflower). The Samoa Dunes and Manila Dunes both contain wallflower habitat and the only suitable long-term management choice would be the Enhancement of Natural Values Alternative. This choice protects the wallflower by closing the Manila Dunes to offroad vehicle (ORV) use and restricts such use to portions of the Samoa Dunes. In addition, the only secure way to protect the area is to construct a vehicle proof fence around the Menzies wallflower habitat, the nearby wetland and along the northern boundary to stop ORV intrusions on to the dunes to the north. Acquisition of private lands within the boundary depicted on Map 2-2 and fencing to exclude ORVs will provide additional protection for this sensitive area.

Lacks Creek and Butte Creek

The Lacks Creek and Butte Creek Resource Management Areas are both regions of significant timber resources. BLM proposes to increase timber production on Lacks Creek while protecting significant acreage in a RNA/ACEC in the Butte Creek tracts. There are rare plant issues to be addressed in each area. One California Native Plant Society (CNPS) List 4 plant Listera cordata (heart-leaved tway blade) occurs in these areas and is mentioned in the draft. Another plant, Bensoniella oregona (bensoniella), a state-listed Rare species, is known from scattered sites on private lands and Six Rivers National Forest in Humboldt County. This species was thought to be extinct until 1977 at which time it was relocated. It is likely that with additional surveys, this plant may be located on the BLM lands in question. The plan should include a discussion of the possible occurrence of Bensoniella on BLM lands and studies to determine proper management of this species. Bensoniella currently does not receive protection and could be threatened by timber harvesting.

The preferred alternative is acceptable for both areas, provided the rare plant issues are addressed, and the implementation does not result in further degradation of the Redwood Creek watershed.

568-5

Red Mountain

The Red Mountain Resource Management Area contains significant populations of several rare plants that are listed in the text. The Enhancement of Natural Values and No Action Alternatives are similar in the protection afforded to the State and federally-listed plants of Red Mountain. Two of the State-designated plants, *Eriogonum kelloggii* (Kellogg's buckwheat) and *Silene campanulata* (Red Mountain catchfly), are endemic to the serpentine soils of the area. Long-term protection must include limiting mineral withdrawal to prevent destruction of the essential habitat for these species. We recommend expanding the Red Mountain RNA/ACEC and acquisition of mining claims on federal lands to provide further protection.

568-6

To assure continued protection of high water quality in the South Fork Eel River, remaining private lands within the Cedar Creek watershed should be acquired. Also, the remaining private inholdings within the Wild and Scenic River corridor along the South Fork Eel River below Ten Mile Creek should be acquired to improve protection for that corridor.

King Range Vicinity

The King's Range Vicinity Resource Management Area tracts are scattered parcels that probably support populations of *Calamagrostis foliosa* (leafy reed grass). This State-listed Rare plant is known from sites in the King Range Resources Area and is likely to be found in the adjacent region. The status of this plant appears stable at this time and few impacts are expected from BLM disposal of scattered areas. We support the preferred alternative for this area.

Covelo Vicinity

We object to the preferred alternative for the Covelo Vicinity Management Area which would dispose of all public lands (66,500 acres) including, according to the EIS p. 4-15, "such sensitive areas as the Big Butte portion of the Yolla Bolly, Middle Eel Wilderness, the Eden Valley and Thatcher Ridge Wilderness Study Areas, Eden Creek, Little Darby, Hulls Creek, and portions of the Wild and Scenic River System (lands within the corridor of Middle Fork and North Fork of the Eel River)." Because of the substantial fish and wildlife resources and associated recreational values of these lands, we believe that they should be retained in public ownership. If they are not transferred to the Forest Service or another land management entity committed to long-term public management, we would prefer that the No Action Alternative be selected. If lands in the management area are disposed of, disposition should be limited to smaller blocks of land not fronting on designated units of the National Wild and Scenic River System, Hulls Creek or other significant tributaries.

568-7

Few of the land blocks within this category occur east of Covelo. Lands disposed of in this area should be used to consolidate other blocks of public lands, particularly those within the management area, if they are not used to meet State of California in-lieu entitlements.

The only State-listed plant in the vicinity is Lupinus milo-bakeri (Milo Baker's lupine), which is listed as threatened. It occurs in Round Valley and is not expected to be found on the BLM land, although it should be taken into consideration when surveys are conducted and management plans are formulated. Pogogyne douglasii var. parviflora (Douglas' pogogyne) is a CNPS List 4 plant of concern that is known to occur within the BLM lands. Its needs should be addressed in planning documents to avoid unnecessary impacts which might cause it to become threatened.

568-8

Scattered Tracts

We support retaining 5,000 acres in public ownership at Eagle Peak, Greenough Ridge and the Cedars. As noted before, we favor retaining Iaqua Buttes in public ownership to maintain old growth habitat if a suitable substitute site at Thatcher Ridge or Charlton Creek/White Slide cannot be found.

Since there is a shortage of angling access to the Klamath River in the vicinity of Weitchpec and downstream we suggest that the Weitchpec parcel, which provides access to two fishing holes, either be retained or transferred to another agency such as the Forest Service or the Department of Fish and Game for maintenance of angling access.

The BLM Scattered Tracts present several different plant questions due to the diverse habitats and geographic areas encompassed by these lands. Of particular interest is the 3000 acre "The Cedars" area in Sonoma County. The Cedars represents an outstanding example of a Sargent Cypress forest restricted to a localized serpentine soil type. In addition to the cypress, several other plants restricted to serpentine are present. These include Streptanthus morrisonii (Morrison's jewelflower), a rare plant of localized distribution on serpentine and a newly described mariposa lily, Calochortus raichei, whose distribution is entirely restricted to The Cedars area. This unique botanic area deserves recognition as an RNA/ACEC due to the unusual assemblage of serpentine endemics present. Further research is being conducted on the taxonomic status of Streptanthus morrisonii which could result in the recognition of new taxon from The Cedars.

568-9

Near the Bear Butte parcel in southern Humboldt County another endangered plant was recently rediscovered. Astragalus agnicidus (Humboldt milk vetch) was the subject of an eradication program by local ranchers who thought it was responsible for sheep poisoning in the area. This milk vetch was thought to be extinct until 1987

568-10

when a population was discovered on private ranchlands in the vicinity of Bear Butte. Further investigations are needed to determine the extent of existing populations of this State-designated Endangered plant prior to disposal of any federal lands in this vicinity.

568-10

In summary, the Department is concerned that many of the proposed management actions outlined in the RMP may not achieve the stated objectives for the sensitive fish, wildlife, and plant species, and for watershed integrity, water quality, and protection of the Wild and Scenic River corridor along the South Fork Eel River. In addition, because rare plant information is not available for many of the sites slated for possible disposal and timber sales, we recommend that no parcels be approved for sale before thorough surveys are conducted and the areas are given clearance by trained botanists. Areas found to have significant rare plant resources should not be sold, but retained as BLM-protected sites. Further studies are needed prior to implementation of management decisions in order to adequately protect rare plant populations and habitats.

568-11

We appreciate the opportunity to provide comments on this important planning document. If there are any questions regarding these comments, please contact Mr. Don Lollock, Chief, Environmental Services Division, 1416 Ninth St., Sacramento, CA 95814 or by telephone at (916) 445-1383.

Pete Bontadelli
Pete Bontadelli
Director

RESPONSE TO COMMENT LETTER 568

- 568-1 Due to the low economic mineral potential and low interest in mineral development within the Resource Area, a comprehensive appraisal of the mineral resource potential was not necessary.
- 568-2 The text has been changed in the FEIS to include a statement on conformance with the California Surface and Reclamation Act (SMARA). See p. 1-12, FEIS.
- 568-3 A geotechnical investigation of proposed road locations on timber sale areas is referenced on p. A-9 of Appendix 2-1. Soil and geologic descriptions are contained in the 1980 Draft Timber EIS for SYU-13 and this document is referenced on page 1-7 of the DEIS.
- 568-4 The direction of Scattered Tracts Management Area has been changed to retain and manage the Gilham Butte and Laqua Buttes areas for old-growth values and spotted owl habitats. See response 520-5.
- 568-5 Site specific environmental assessments which include rare and sensitive plant inventories are done for every proposed timber harvest area. A full discussion of the occurrence or possible occurrence of rare species is done at this level of activity planning.
- 568-6 The Red Mountain RNA/ACEC Activity Plan (1988) affords protection to the rare plants located in the serpentine soils of the area. Mineral entry and timber harvesting are both limited in this area to afford long-term protection to these natural values.
- 568-7 A majority of the lands disposed under the Covelo Preferred Alternative would be transferred to the USFS and protection afforded through their land use plans. The wild and scenic river system would continue.
- 568-8 See response 568-6.
- 568-9 'The Cedars' area in Sonoma County is to be retained and designated an RNA/ACEC as outlined in the No Action (Preferred) Alternative for the Scattered Tracts Management Area.
- 568-10 The Bear Buttes parcel was disposed of in 1987 to block up federal ownership in the King Range Area. A thorough botanical inventory was conducted prior to disposal. No state or federal designated endangered plant was found on the federal land being disposed.
- 568-11 All proposed management actions outlined in the RMP are screened for sensitive wildlife, plant, watershed and wild and scenic river concerns by using programmatic EIS's, site specific EA's and detailed activity plans.

Various clearances are done prior to disposal of federal land.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

ARA-570

John Lloyd, Area Manager
Arcata Resource Area
U.S. Bureau of Land Management
1125 16th Street, P.O. Box 1112
Arcata, CA 95521

18 JUL 1988

Dear Mr. Lloyd:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the ARCATA RESOURCE MANAGEMENT PLAN; HUMBOLDT, MENDOCINO, SONOMA AND TRINITY COUNTIES, CALIFORNIA. Under the National Environmental Policy Act and Section 309 of the Clean Air Act, the EPA is required to review and comment on this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns-Insufficient Information (see the attached "Summary of Rating Definitions and Follow-up Actions"). Our rating reflects environmental concerns that we have with potential adverse impacts to water quality and protected beneficial uses caused by multiple use activities such as intensive timber logging; and potential adverse impacts of herbicides use on surface water, ground water, and protected beneficial uses. Our detailed comments on this DEIS are enclosed.

We appreciate the opportunity to review this DEIS. Please send us three copies of the Final Environmental Impact Statement (FEIS) at the same time it is filed with the EPA's Headquarters' Office of Federal Activities. If you have any questions concerning our comments or need further information, please contact me at 415-974-8083 or have your staff contact David R. Tomsovic at 415-974-8177.

Sincerely,

Deanna M. Wieman
Deanna M. Wieman, Director
Office of External Affairs

4 Enclosures:

Summary of Rating Definitions, 1 page
EPA Comments on Arcata DEIS, 3 pages
Section 319, 4 pages
EPA 3/1/88 comment letter to BLM, 8 pages

cc: Mr. Charles Greene, North Coast RWQCB, Santa Rosa
Mr. Ed Hastey, BLM, Sacramento
Mr. John Norton, SWRCB, Sacramento

RECEIVED
JUL 20 1988

BUREAU OF LAND MGMT.
ARCATA RESOURCE AREA

18 JUL 1988

PA Comments on Draft Environmental Impact Statement, Arcata
Planning Area, California

Pesticides Comments - Federal Insecticide, Fungicide and
Rodenticide Act

Page 1-1 of the DEIS notes that "A major thrust of the plan is to address the viability of intensively managing timber resources within Sustained Yield Unit 13 (SYU 13) as specified in the 1981 Record of Decision (ROD)." One controversial element of timber management in California is the use of herbicides to control competing vegetation and pests.

Earlier in 1988 the Bureau of Land Management's State Director in Sacramento issued a Draft Environmental Impact Statement (DEIS) for "California Vegetation Management," which includes the Arcata Planning Area. The EPA expressed several concerns with the Vegetation Management DEIS that pertain to the Arcata Planning Area DEIS. In particular, we recommend a discussion of the items below in the Arcata FEIS. For your reference, we have enclosed a copy of our March 1, 1988 letter to BLM on the "California Vegetation Management" DEIS.

1. The Arcata FEIS should discuss how the BLM will assure that this EIS is consistent with the BLM's final programmatic vegetation management decisions. Are the herbicide use decisions in the Arcata EIS contingent upon completion of the Vegetation Management EIS? How will the specific herbicides be selected?

570-1

2. Under Section 313 of the Clean Water Act and Executive Order 12088 (Federal Compliance with Pollution Control Standards; October 13, 1978), the BLM must meet California water quality standards regardless of the management activity, and manage in a manner to protect or enhance water quality where standards are not established. The FEIS should discuss in detail what measures (including Best Management Practices) will be adopted to maintain or enhance water quality.

570-2

3. Surface waters have a wide variety of beneficial uses: drinking water supplies, ground water recharge, fisheries, wildlife habitat, and agricultural/livestock water supplies. Protecting water quality means protecting beneficial uses. The protection of sensitive uses such as drinking water supplies and fisheries is especially critical. Drinking water supplies, ground water recharge and fisheries are among the most sensitive uses designated for many BLM streams, creeks and lakes.

We recommend that the Arcata FEIS discuss the beneficial uses of surface waters that could be impacted by herbicides use. The Arcata FEIS should discuss how the BLM will protect drinking water supplies and other sensitive surface waters, in order to protect public health and the environment. The FEIS should also discuss how many acres are proposed for herbicides application, per year or over a longer period.

570-3

Appendix 2-2 ("Site Preparation and Release Specifications for Chemical Treatment") contains a broad variety of mitigation measures to protect public health and the environment. We request that the FEIS discuss what site-specific criteria will be used to ensure that surface waters and their beneficial uses are fully protected. For example, spraying within 50 feet of a waterway may not be sufficient to protect drinking water supplies or fisheries if the topography is steep or spraying occurs before heavy rains. Additional protective measures should be considered, on an individual case basis, taking into account topography, precipitation, time of year, and the beneficial uses of the surface water.

570-4

Specifically, the EPA recommends that water quality planning, monitoring and compliance with water quality standards be fully coordinated with the North Coast Regional Water Quality Control Board (RWQCB) in Santa Rosa. The RWQCB has adopted specific regulations and monitoring requirements for the application of herbicides.

570-5

The RWQCB has adopted Best Management Practices (BMPs) developed by the U.S. Forest Service which regulate the non-aerial application of herbicides; these BMPs have been incorporated into the Basin Plan.

Additionally, should the aerial application of pesticides be proposed at some future date, such aerial application would be subject to the the RWQCB's mitigation measures, notice requirements and waste discharge requirements.

4. The EPA recommends that the FEIS discuss what types of monitoring, mitigation and reporting requirements will be adopted to ensure that ground water resources are not contaminated. This is particularly important for any herbicides that are capable of leaching into ground water supplies.

570-6

5. The Arcata Planning Area DEIS states on page A-5 that individual Environmental Assessments (EAs) "will be prepared for discrete timber management projects to evaluate site-specific problems." The application of pesticides is a very controversial activity in California, especially in the northern counties. We would encourage the BLM to make extensive efforts to involve the public in its herbicide application EAs.

570-7

We recommend that the Arcata FEIS discuss how the BLM will coordinate with the public (adjacent landowners, industry, citizen's groups, and State/local/county government agencies) to ensure adequate participation and comment in the EA decision-making process.

570-8

18 JUL 1988

Water Quality Comments - Clean Water Act

Section 319 of the Water Quality Act of 1987 established a new program that requires States to assess nonpoint source water pollution problems, develop a nonpoint source pollution management program, and implement controls to improve water quality. Identified control measures should be implemented on BLM lands to address nonpoint source water pollution problems. Close coordination by the BLM with the State Water Resources Control Board (SWRCB) in Sacramento will help to ensure that projects, activities and erosion control measures in the Arcata Resource Area are consistent with California's new non-point source management program. Once final rules are developed by the SWRCB, it may be necessary for your Resource Area to coordinate its planning activities and erosion control measures with the North Coast RWQCB.

570-9

For your reference, a copy of Section 319 is enclosed.

Hazardous and Toxic Substance Comments - Superfund

Page 1-3 of the DEIS states that one of the primary goals of the planning effort is to "identify land which the BLM should acquire/consolidate to enhance its mission." Several of the alternatives propose that the BLM acquire various amounts of land (>10,000 acres) not currently under Federal ownership.

The EPA recommends that the FEIS discuss what process the BLM will use to determine whether any of the acquired lands contain sites where hazardous substances were improperly or illegally disposed of in past years. Once the lands become BLM property, the BLM becomes a responsible party under the terms of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, P.L. 96-510; December 11, 1980), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA, P.L. 99-499; October 17, 1986). This law is more commonly known as "Superfund." As such, the BLM could be potentially responsible for remedial investigations, cleanup activities, and full or partial cleanup costs.

570-10

General Comment

We recommend that the FEIS discuss, in general terms, how each land acquisition/land disposal alternative would positively or negatively impact natural resources. For example, would the acquisition/disposal of certain tracts of land have any negative/positive impact on water quality, fisheries, wetlands, riparian communities, or other sensitive natural resources? Generally speaking, would sensitive natural resources receive the same level of protection under Federal, State or private ownership?

570-11

RESPONSE TO COMMENT LETTER 570

- 570-1 A statement on the consistency of any herbicide use within the Arcata Resource Area with procedures and limitations as outlined in the California Vegetation Management FEIS and Record of Decision (November 1988) is included in the PRMP/FEIS on p. 1-9. All site specific environmental assessments on herbicide selections and use will be based on the guidelines established by the management decisions contained in the Final Programmatic Vegetation Management EIS.
- 570-2 The BLM's established best management practices (Water Quality 208 Program) comply with Executive Order 12088 and meet all California Water Quality Standards. In addition, operating parameters to ensure water resource protection are contained in the Yokayo Grazing Management Plan and SYU-13 Timber Management Activity Plan and are incorporated by reference or made a part of the Appendix (pp. A-5 to 16).
- 570-3 Impacts to surface waters from herbicide use is addressed in the Vegetation Management EIS and Record of Decision (1988) which is referenced in the FEIS/PRMP on p. 1-8. Site specific environmental assessments will discuss in more detail impacts and mitigation as projects are proposed. Since no specific herbicide treatment projects are proposed for the Arcata Resource Area a discussion of treatment acres in the FEIS would not be meaningful.
- 570-4 We feel site-specific criteria should be discussed within site-specific environmental assessments to ensure the protection of surface waters and ground waters. Such criteria as topography, precipitation, season of use, etc., can be meaningfully discussed at this level of analysis.
- 570-5 As required by Executive ORder 12088 of the Clean Water Act, water quality planning and monitoring will be coordinated with local water quality control boards on all projects implemented by the Bureau of Land Management.
- 570-6 See response 570-4.
- 570-7 Controversial projects, such as herbicide use, will incorporate extensive public notification and participation during the environmental assessment and project planning stages.
- 570-8 Interested publics will be notified on controversial projects or projects of high public interest using a 'key public' contact list. This list will ensure adequate participation and comment from adjacent landowners, citizen groups, industry and governmental agencies. Annual timber harvest and forest development plans are also made available to interested publics industry and relevant governmental agencies using appropriate district mailing lists.

- 570-9 See response 517-7, 570-2. The Bureau's BMP imply periodic review of the state's non-point source management program to ensure compliance from all BLM projects and activities.
- 570-10 All lands acquired by the BLM are subject to performance of a certificate of inspection and possession as well as a detailed real estate appraisal. Hopefully, this will expose any toxic waste dumps or hazardous materials on the proposed acquisition parcel. Clean-up activities could be initiated and paid for through the escrow process before transfer of title is completed.
- 570-11 See response 481-5.

1/23/88

Dear Mr. Wright

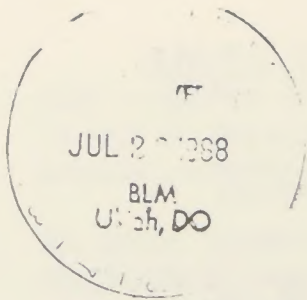
ARA-609

If has just come to my-attention that the BLM is considering logging & road building in the Canty Peak area. I am one of the many people who feels too much old growth forest has already been destroyed, especially in Mendocino County. I am asking you to do what you can to protect whatever Old Growth forests are left. If trees are truly America's renewable resource then we don't need to continue cutting what little Old Growth areas that are left.

Sincerely

Linda Peters

LINDA PETERS
9050 ORR SPGS, Rd.
UKIAH, CALIF. 95482



COUNTY OF MENDOCINO
BOARD OF SUPERVISORS
COURTHOUSE
UKIAH, CALIFORNIA 95482

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TELEPHONE
(707) 463-4221

July 14, 1988

ARA-623

Mr. Al Wright, District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482-5599

Dear Mr. Wright:

The Mendocino County Board of Supervisors would like to offer its comments regarding the Resource Management Plan and Environmental Impact Statement for the Arcata Planning Area. Our comments are limited to only those areas lying within Mendocino County and where management planning primarily affects timber resources.

With regard to the King Range Vicinity, we are in agreement with your preferred alternative "Enhancement of Natural Resources".

With regard to the Red Mountain, we are in agreement with your preferred alternative "Enhancement of Natural Resources"

With regard to the Covelo Vicinity, we are in partial agreement with your preferred alternative "Administrative Adjustments" as we approve your proposed transfer of BLM lands to the U. S. Forest Service. Concern has been expressed to us that other disposals to unknown entities may not fully achieve resource protection and enhancement and therefore we ask you to carefully evaluate the benefits of any future transfers other than to the Forest Service.

With regard to the Scattered Tracts, we are in partial agreement with your preferred alternative "Administrative Adjustments". Our reservations are focused on Gilham Butte, which appears to be targeted for disposal without any clear justification.

Furthermore, we would like to have the opportunity to discuss with your staff, the possibility of having the Little Darby Area, east of Willits transferred to the County's Department of Parks and Beaches for future use in a program of environmental education.

THE BOARD OF SUPERVISORS

MARILYN J. BUTCHER
FIRST DISTRICT

NELSON REDDING
SECOND DISTRICT

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THIRD DISTRICT

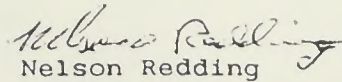
JOHN CIMOLINO
FOURTH DISTRICT

NORMAN L. de VALL
FIFTH DISTRICT

7/14/88

And lastly, we would remind you of our concern about maintaining the integrity of the General Plan with regard to not permitting any large-scale mining activity in the Red Mountain area.

Sincerely,


Nelson Redding
Chairman

NR/gg

cc: Pete Passof, U.C., Cooperative Extension, Mendo. County
Art Kramer, Director, County Parks & Beaches

Mr. John Lloyd
Bureau of Land Management
16th & J Streets
Arcata, CA 95521

Dear Sir:

We have recently heard that BLM is considering taking more commercial timber land out of production in Humboldt County. One area we have heard about is the Gillham-Buttes area. Humboldt County cannot afford to lose even one more acre of its commercial timber producing land. Please take whatever steps necessary to keep timber land in production.

Sincerely,

Vietta L. Roberts

List of PREPARERS

LIST OF PREPARERS

<u>Name</u>	<u>Position</u>	<u>Education & Experience</u>
Dan Averill	Project Manager	B.S. Forest Management BLM, Supervisory Forester - 4 years BLM, Staff Forester - 4 years BLM, Field Forester - 6 years USFS, Field Forester - 1 year
John Lloyd	Area Manager	B.S. Business Administration B.S. Park Administration BLM, Area Manager - 3 years BLM, Evaluation Staff - 2 years BLM, Supv. Rec. Planner - 3 years BLM, Recreation Planner - 4 years
Francis Berg	Cultural Resources	BLM, Archaeologist - 10 years
Bruce Cann	Recreation	B.A. Natural Resources M.S. Natural Resources BLM, Outdoor Rec. Planner - 6 years BLM, Recreation Technician - 1 year
Earle Curran	Recreation	B.S. Park Management NPS, Park Ranger - 11 years NPS, Park Manager - 5 years BLM, Outdoor Rec. Planner - 7 years
Bruce Dawson	Botany	B.A. Botany M.S. Natural Resources BLM, Range Con. - 9 years
James Decker	Wildlife, Fisheries	B.S. Natural Resources BLM, Fish & Wildlife Biologist - 10 years FWS, Biologist - 3 years
Clarence Killingsworth	Word Processing	BLM, Office Manager/Clerk-Typist - 4 years
Adrian Swensen	Forest Management	B.S. Forestry USFS, Forester - 9 years BLM, Forester - 18 years
Barbara Taglio	Public Affairs	BLM, Administration - 10 years BLM, Editorial Assistant - 2 years BLM, Public Info. Officer - 6 years

<u>Name</u>	<u>Position</u>	<u>Education & Experience</u>
Robert Walker	Lands	B.S. Wildlife Biologist BLM, Realty Specialist - 8 years BLM, Natural Res. Spec. - 5 years USFS, PSW F&R Exp. Sta. - 1 year
Sharon Waechter	Cultural Resources	B.A., M.A. Anthropology M.A. English USFS, Asst. Forest Archaeologist - 5 years BLM, Archaeologist - 2 years

CALIFORNIA STATE OFFICE SUPPORT TEAM

Richard F. Johnson	Deputy State Director, Lands & Renewable Resources
Carl D. Rountree	Chief, Planning and Environmental Coordination
Robert A. Barney	Planning Coordinator
John S. Mills	Environmental Coordinator
Judy E. Bowers	Land Law Examiner
Julie M. Littlejohn	Secretary

Appendi

APPENDIX 1-1

CANDIDATE OLD-GROWTH FOREST RESERVES

INVENTORY AND ANALYSIS

Inventory of the candidate old-growth reserves was accomplished by crews of The Nature Conservancy under cooperative agreement with the BLM. "Old-growth" is a very nebulous concept and what constitutes an adequate indication of "old-growth" is not scientifically fixed. Therefore, a variety of data were collected by TNC crews, not all of which were ultimately used for determining old-growth significance of the candidate reserves.

In general, the following factors were considered:

1. Total number of vascular plant species.
2. Total of old-growth associated animal species. such as spotted owls, the quintessential California red-backed vole, hermit thrush, hermit warbler, pileated woodpecker.
3. Number of bird species as an indicator of diversity.
4. Presence or absence of perennial water.
5. Species composition and stand condition such as age, defect, associations.
6. Amount of woody debris and snags.
7. Geographic continuity and manageability of the candidate reserve.
8. Location - significance as a "stepping stone" or tie with other known old-growth units, such as Forest Service SOMAs.

Similar inventories were done in the King Range National Conservation Area and the Northern California Coast Range Preserve; these were used as standards to measure the conditions of the candidate reserves.

APPENDIX 1-2

MANAGEABILITY

Manageability is a realistic appraisal of the grazing leases administered by the Ukiah District relative to the District's ability to soundly manage these leases. In that BLM has a commitment to responsible land stewardship, it was felt that lands currently under lease for grazing should be evaluated as to how they can be most efficiently managed.

It is the Bureau's position that some land currently under grazing lease would perhaps best be managed by elimination of grazing. Some of these lands are brush-covered with no suitable acreage present. In other cases, a grazing lessee may run a few head of cattle only because the misconception prevails that possession of a grazing lease infers something more than the harvesting of forage and maintenance of range improvements; it does not. In other instances, the belief is held that a lease for grazing preference will make a hunting club business more lucrative. Finally, some tracts are simply so small and isolated and of such marginal suitability that the highest and best use of that land may not be realized at present. It is not BLM's intent to make an ethical evaluation but rather to simply promote the use of each piece of public land for that use for which it is best suited and which we can most responsibly manage.

The manageability criteria are:

1. Size of Land Tract and Location

This is simply used as a guideline for preliminary assessment of management potential.

2. Number of Suitable Acres

Absence of suitable acres immediately places a grazing lease in the nonmanageable category. Any acreage above zero makes the decision discretionary.

3. Number of AUMs

Less than 20 AUMs most often places a grazing base in the nonmanageable category. Twenty-one to 100 AUMs are generally considered the gray area where the manageability decision is discretionary and not weighted. Greater than 100 AUMs are considered manageable the majority of the time.

4. Operator Dependency

No grazing lease is considered nonmanageable if the operator has demonstrated a dependency on the public land for his or her livelihood.

5. Tract Accessibility

Accessible tracts are generally considered manageable. Inaccessible tracts are discretionary.

6. Special Features of the Land

This is strictly supplemental input to facilitate the classification of the grazing leases.

Grazing leases within a given category (manageable or nonmanageable) do not necessarily have to meet all of the criteria to be placed in that category. The determinations are subjective but based on the greatest amount of data obtainable.

APPENDIX 2-1

SUSTAINED YIELD UNIT 13 PARAMETERS

The 10-year timber management plan model identifies the discrete forest management activities for the proposed action and alternatives. These activities incorporate design features as developed by the Ukiah District staff, BLM Manuals, and the Bureau planning process. They represent an appropriate level of specificity for analyzing impacts generated throughout SYU 13 under typical circumstances. Site-specific interpretation of these design features will be considered on a case-by-case basis and modified as necessary to reduce anticipated impacts. Environmental assessments (EAs) will be prepared for discrete timber management projects to evaluate site-specific problems.

ROADS

Access will be provided by the development of permanent road system within all areas identified for intensive forest management and within permanent easements. Road design criteria will reflect the minimum standards acceptable for timber harvesting equipment on public lands, with somewhat higher standards where BLM roads become significantly used for public access.

Roads will be constructed in locations that require minimal surface disturbance and will avoid unstable areas and slopes in excess of 70 percent. A concerted effort will be made to use existing roads in developing road systems. However, a designed road will be built in preference to existing roads that are in poor locations, have excessive grades, or have severe drainage problems. Right-of-way clearing will be kept to a minimum width and will not normally exceed 5 feet above the top of the cut and 5 feet below the toe of the embankment. Vegetation will be removed for the primary purposes of reducing hazard and preventing undue shading of the road. Small trees and brush will be left in place to help stabilize cut and fill slopes.

Mainline roads will be designed as single-lane, low-traffic capacity roads. Normal subgrade width will be 16 feet with an additional 4 feet for a ditch. Mainline roads will be ditched and will have appropriate drainage structures. In accordance with BLM Manual 9113, the normal maximum grade will be 8 percent favorable and adverse where possible.

Spur roads used exclusively during timber harvesting will have a 14-foot subgrade and no ditch. Such spurs will be outsloped during construction and waterbarred and not maintained until the next stand entry. Spurs will be physically blocked to prevent unauthorized use.

Full-bench excavation with end hauling of waste material will be used on slopes exceeding 60 percent. Waste areas will be included in the road design and will include additional waste areas for slide that may occur after construction. Waste areas will be located so that material will not erode into streams, lakes, or reservoirs.

An active program of road dust abatement will be implemented on all active timber sales.

Cut and fill slopes and waste areas will be revegetated where necessary to reduce surface sloughing.

All stream crossing structures will be designed and constructed to allow free passage of fish in streams where a significant fisheries resource exists.

SILVICULTURAL SYSTEMS

MANAGED OLD-GROWTH

Research (Franklin et al. 1979) indicates that old-growth forests are ecosystems with elements critical for maintaining forest and stream productivity and health. These structural elements are (1) large trees, (2) large snags, (3) large woody debris on the forest floor, and (4) large woody debris in headwater streams.

1. The rotation age for Douglas-fir and associated conifers would be 100 years. Hardwoods would be carried as a coppice (originating from sprouts) and clearcut at every stand entry except the third.
2. A two-stage shelterwood regeneration system would be employed. Half the volume or basal area of 100-year-old trees would be retained as overwood until age 115.
3. Precommercial thinning would occur simultaneously with overwood removal as soon as sufficient regeneration is established (about 15 years after the seed cut).
4. The 400 stems normally left after precommercial thinning (Reukema and Bruce 1977) would be reduced to 360 to allow 10 percent of the acreage to be occupied by superdominants, when present.
5. Commercial thinning would be done at stand ages 38, 51, and 69.
6. At the time of precommercial thinning and overwood removal (15-year-old and 115-year-old trees, respectively), approximately 20 percent of the overwood stems would be recruited as superdominants and carried for an additional 85 years to an age of 200 years. The retention of these scattered superdominants, supported by approximately 10 percent of the growing capacity of the site, is the only major deviation from a modern concept of intensive management. Approximately twelve 18 to 20-inch diameter trees per acre would be recruited as superdominants and allowed to develop old-growth characteristics.
7. During the period between 115 and 200 years, some superdominants would naturally convert to snags and down logs. At 200 years, additional snags and down logs would be recruited from the superdominants. Half of the superdominants volume at age 200 would be available for commercial extraction; the remainder would be invested in the site.

YARDING SYSTEMS

Commensurate with the application of shelterwood as the primary silvicultural system, cable yarding will normally be the only system used on slopes over 35 percent. Tractor yarding will be limited to slopes under 35 percent. Although the slope may be less than 35 percent, skidders that exert low ground pressure or cable yarding systems will be required on areas highly susceptible to erosion or areas with slope stability and compaction and puddling problems. High-lead yarding will normally be used where slope dictates tractor restrictions and where topographic limitations will not permit a skyline setup. For future use, permanent features of cutting units, such as roads and landings and tailholds, will be left in a usable condition. Skid trails and tractor yarding will not be allowed in natural drainage ways to ensure that the natural drainage network is left intact.

BUFFER STRIPS

Buffer strips are defined as zones of relatively undisturbed forest along perennial and intermittent drainages designed to protect riparian and aquatic ecosystems and the watershed from forest management activities.

Buffers will be a minimum width of 125 feet (horizontal distance) from the edge of the stream for perennial streams and 75 feet for intermittent streams.

Root wads and slash that accumulate in the drainages as a result of logging operations will be removed. However, the buffer strip will eliminate this need in most cases. There will be no intermediate cuts, fertilizing, or other practices within the buffer.

HERBICIDES

The use of herbicides has not been a normal practice of the forest management program for SYU 13. Herbicide use on a limited scale is planned in the proposal. However, this use will not be obligated in the allowable cut computation. The proposal calls for a hand-applied herbicide release spray on 135 acres of conifer site presently suffering from grass competition. Such an action would be subject to specific design features included in herbicide project plans and guidelines for application. These guidelines are listed in Appendix 2-3, "Site Preparation and Release Specifications for Chemical Treatment - Ukiah District SYU 13 Timber Management Plan." Additionally, such projects would be subject to site-specific recommendations generated from an environmental assessment.

Specific projects for herbicide use in SYU 13 are developed in the Ukiah District Office. All proposed use of herbicides on public lands will be reviewed in advance for approval by the Bureau's Washington, DC Office and will comply with Environmental Protection Agency guidelines.

SLASH DISPOSAL AND SITE PREPARATION

Gross yarding of down material would not generally be done. To improve plantability, spot burning of exceptionally dense slash is preferred in this alternative. The intent is to leave as much large litter as possible on the site.

All slash disposal requirements, including gross yarding and fire trail construction, will be included in all timber sale contracts where applicable. Mechanical treatment of brush and slash, such as the use of choppers and cutters, will be limited to slopes of 35 percent or less. Lopping, scattering, and spot burning of concentrations will also be used.

Sufficient site preparation/scarification will normally be provided during harvest activities. However, on slopes of 35 percent or less, additional scarification will be provided by mechanical means where needed.

REGENERATION

Regeneration will be established within five years after initial entry. Natural regeneration will be favored as the primary means to retain diversity and ensure adaption of seedlings to the site. Artificial regeneration will be used to augment natural regeneration under shelterwoods and where there is not sufficient overstory for good seeding. Before final cuts in shelterwood and seed-tree areas are made, stocking surveys will be done to ensure that the area is sufficiently stocked.

ANIMAL DAMAGE CONTROL

Old Plantings

To date, there is no effective practical method to control animal damage to older plantings. Such measures as fencing and poisoning are unacceptable from an economic and environmental standpoint.

New Plantings

Where a need is anticipated, plastic tubing (such as Vexars) will be used on newly planted stock.

INSECT CONTROL

Epidemic outbreaks of destructive insects will be controlled with the advice and cooperation of the U. S. Forest Service, as stated in BLM Manual 5800.

SANITATION/SALVAGE

Large-scale fire kill and catastrophic windthrow will be logged on an immediate basis, while minor cases will be handled whenever possible. The purpose will be to salvage any merchantable volume and prevent serious spread of diseases and insects.

ADDITIONAL MITIGATIONS

Spills/Watershed

Preferred road locations will be on ridgetops and on the upper one-third of the slope.

Roads will not be built on slopes in excess of 60 percent.

Mainline roads will be maintained at least annually, and more often if warranted. Waterbars and drainage structures on spur roads will be maintained for two years after construction. Rolling grade dips will be constructed and maintained where necessary on mainline and spur roads.

Main haul roads will be rocked to a moderate depth if used year-round. Alternative: roads will be closed to all traffic, including BLM, during the rainy season.

Geotechnical investigations will be conducted on proposed road locations far enough in advance of construction that major realignment can be surveyed and investigated.

Skid trails will be ripped when needed to improve soil structure.

No excavation will normally be permitted for skid trails,

Rubber-tired skidders will be prohibited except as swing machines on permanent mainline and spur roads.

There will be a 100-foot buffer zone around active slides. Actual tractor or road entry will be prohibited within this zone. No logging will be done in the slide area and buffer zone, but downed trees can be salvaged by end-lining from outside the buffer zone.

Inactive slides will not be undercut by roads.

Cable yarding across streams will be permitted only if sufficient deflection is available on the yarding corridor to fully suspend logs. Sufficient deflection will be provided to prevent flown logs from hitting the edge of a bench or bluff directly above the creek bank.

With the exception of road construction equipment, tractors and other machinery will not be permitted to operate within 30 feet of ephemeral channels and drainage areas. Merchantable trees may be harvested in this zone by directional falling techniques, but nonmerchantable vegetation will be left essentially intact. Hardwood control by hand and replanting may be done to maintain a productive timber site. When necessary, yarding across channels will be done only in dry weather and perpendicular to the channel.

Road oiling using the proper formulation and successive applications will be done on continuous use roads.

Vegetation

BLM will establish at least one seed production area for every seed zone and appropriate elevation zone.

Wildlife

Where present, BLM will provide and maintain an average of 5-6 hard snags per acre (where feasible additional snags should be provided).

- Approximately one-half of all snags retained should exceed 21 inches in diameter and preferably be over 45 feet in height. While large snags are preferred, advantage should be taken of any snags, particularly during initial harvest and early implementation of snag retention programs.
- Snags can be left in small groups or singles to take advantage of existing snags. As snag management proceeds, it is desirable to distribute snags throughout the area. Overall, it is somewhat more desirable to leave proportionally more snags in the proximity of forest edges and streams.
- Where choice is possible, ponderosa pine is a preferred species for snag retention.
- All possible efforts will be made to meet snag requirements upon initial timber harvest entry. In some cases, this may require leaving a safety zone (a radius of the length of the snag) around its base to protect workers.

BLM will leave a minimum of a six downed logs per acre (Thomas 1979). Additional logs are desirable.

- When harvesting a stand, all presently occurring downed logs will be left in place. If an impassable jumble of logs is present, some can be scattered and, if necessary, removed.
- Where the minimum number of logs does not occur, unmerchantable sections of cut cull trees will be left in place or brush piles can be substituted until downed logs can be recruited.
- Uncharred logs are preferred since charring hardens the surface and slows decomposition, making them less valuable to wildlife. In this regard, broadcast burning of large acres of the forest floor will be discouraged.
- It is desirable to maintain a variety of logs in various stages of decomposition, and orientation along contour lines is preferred (Thomas 1979).
- The most desirable logs are at least 17 inches in diameter and 20 feet in length.

BLM will retain and maintain a minimum of five mature broad-leaved trees per acre and the same number of younger replacement trees.

- Species retained will be representative of natural vegetation occurring on the site; however, certain plants have greater values for wildlife than others, One such example is black oak (*Quercus kelloggii*).
- Broad-leaved tree retention and recruitment recommendations will be made on a case-by-case basis by a wildlife biologist.

Springs and seeps will be protected by 75 feet of undisturbed zones.

Natural meadows will be protected by a minimum 75 feet buffer zone (measured horizontally). Final width recommendation will depend on density of the stand and other site specific criteria. A selective harvest may be permitted; however, a minimum canopy cover of 50 percent will remain, and no more than half of the trees with dbh of 21 inches will be removed. All snags will be retained.

The integrity of meadows will not be altered by timber harvest activities, including operation of machinery, falling, yarding, road construction, etc.

If on a particular site it is believed that a 75 feet buffer zone would result in excessive damage from windthrow, the zone will be expanded or cutting will not occur.

A minimum of 20 acres of mature and/or old-growth forest will be retained in each harvest area. This is especially important where the harvest block is relatively small and contains all or most of the remaining mature timber in an area. Additional area may be required where sensitive species are involved.

Attempts will be made to reduce the size of harvest area and stagger cutting cycles to provide a continuum of forest successional stages through long-term planning.

Where stream crossings are absolutely necessary, the road will be constructed in such a manner so as to reduce the amount of streamside area involved to a minimum. This would involve an attempt to cross the stream and its buffer zone at a right angle.

Roads and skid trails will not parallel buffer zones.

Each proposed timber sale and road network will be inventoried by wildlife biologist at an early state of planning.

Biologists from other agencies (e.g., CDFG, USFWS) will be asked to participate in sale area inspection and recommend mitigation.

Special effort will be made to determine if suitable habitat is present for low density species, including pine marten, fisher, red tree mouse and flammulated owl.

Spotted Owl

Approximately 300 acres, or where available more, will be provided for each pair of spotted owls. There have been 15 observations of this species as noted in Chapter 3 on public lands in SYU 13. If further inventory of these areas identifies them to be nesting sites, approximately 4,500 acres or 9.24 percent of the available productive forest land base would be deferred from forest management activities for an undeterminable period. Less area may be provided where habitat use occurs in part on land in other ownership and can be preserved through cooperative effort (i.e., this would be primarily involve The Nature Conservancy's North Coast Preserve and the U.S. Forest Service). Land classified as nonproductive forest can be incorporated if it provides suitable habitat.

BLM will monitor known spotted owl areas every two years. Acres set aside for owls include the following:

- the nest site or grove;
- the permanent water course closest to the nest site;
- where suitable, the hillside from drainage area to ridgetop.

Red-legged Frog

If encountered, additional habitat protection may require the expansion of aquatic buffer zones to 200 feet and special precautions in logging the surrounding area (e.g., suspended cable yarding).

California Mountain King Snake

Proposed buffer zones and downed log recommendations will provide a high degree of habitat protection for this species. No other mitigation proposed at this time.

Osprey

If encountered on BLM land, nest sites will be protected by a no cut zone 600 feet in diameter. A one-half mile no disturbance zone will be imposed around the nest from February through August.

River Otter

Where encountered, proposed buffer zone will be expanded to 200 feet and special logging methods imposed to reduce land disturbance.

Mountain Lion and Bobcats

Any denning areas encountered will be protected from human disturbance by rerouting roads and other measures to reduce human disturbance.

Goshawk

An undisturbed area of a minimum of 40 acres will be maintained around the nest site. Long term planning should provide for maintaining suitable nesting habitat in the area for the future. As much north facing slope should be included as possible. Ultimate size will depend on the amount of forest in the area. No timber harvest operations will occur within one-half mile of the nest site from March through August.

Cultural/Sociocultural

Mitigation will include:

1. Signing:

Under conditions of active or potential vandalism, cultural resources will be adequately signed, identifying the protection afforded by law. Care will be taken to ensure that signs are placed in a manner not to intrude upon the values of the site or to draw attention to the resource.

2. Fencing/Gating:

According to the control and preventive measures desired, fences, barriers, railings and gates can be used alone or in combination for restrictable access. In some cases it may be necessary to selectively exclude access to portions of the cultural resource. As with other on-site physical measures, care will be taken not to damage or intrude upon more values than are protected. There are different kinds of fences, barriers, railings and gates and different materials that can be used. The planned design and materials will avoid unwarranted intrusion on the site. In the design of barriers, maintenance requirements and safety will be considered.

Patrolling/Surveillance

Patrols and inspection will be determined by the fragility of resource, degree of threat present, and the use and importance of the cultural resource. Where possible, fragile and accessible cultural resources will be visited and inspected frequently. The visit will result in a report documenting the status of the resource. The report will be evaluated by local, State and Federal agencies and other interested parties.

Irregularly scheduled patrols are one of the best means of preventing pot hunting, vandalism and other unauthorized use. Patrolling requires careful planning and timing to be effective.

Erosion Control

Cultural resources are frequently threatened by various types of erosion. Patrols and inspection surveys will monitor erosion. Checks will be made at water levels, major runoff areas, and where other potential erosion problems exist. Adequate drainage will be provided to prevent damage to resources. Catch basins, diversion dams, and other protection measures can be constructed to reduce erosion and protect the cultural resource. Erosion control should always be performed off-site.

APPENDIX 2-2

SITE PREPARATION AND RELEASE SPECIFICATIONS

FOR CHEMICAL TREATMENT - UKIAH DISTRICT

SYU 13 TIMBER MANAGEMENT PLAN

APPLICATION - GENERAL

Chemicals containing TCDD (dioxins) and/or highly volatile formations (such as butyl esters) and chemicals toxic to fish and other aquatic organisms (such as butoxy ethanol) will not be used.

Aerial applications (helicopter or airplane) will not be used. Applications will be by such methods as: (1) Truck-mounted spraying units; (2) backpack pumps or pressurized tanks; or (3) tree injections, such as with the "Hypo-Hatchet."

Specifications

1. There will be no spraying when wind velocity exceeds 8 miles per hour.
2. There will be no spraying when air temperature exceeds 80 degrees Fahrenheit and relative humidity is less than 50 percent.
3. There will be no spraying within 200 feet of a dwelling or cultivated crop.
4. There will be no spraying within any buffer zone prescribed by the management plan and no spraying within 50 feet of designated waterways.
5. There will be no spraying within any identified rare or endangered species area.
6. Spray tanks and chemical containers will not be washed-out in or near any streams.
7. Chemical containers will not be disposed of in the treatment area.
8. Chemical mixing will be so located that accidental spills will not enter existing streams or bodies of water.
9. All chemical mixing, loading, hauling, and applications equipment will be free from leaks and will operate as designed.
10. The intake operation of water for mixing will be so arranged that an air gap or reservoir will be placed between the live water intake and the mixing tank to prevent any backflow of chemical into the water source.
11. Herbicide emulsions or solutions will be premixed in the presence of the certified applicator prior to filling the chemical tanks.

12. Each container will be rinsed three times with the same substance (oil or water) used to dilute the technical formulations. Each rinsing will be placed in a spray tank for application on target species. No washing or rinsing of equipment or containers and no dumping of chemicals or disposal of containers will be permitted on the project area or other lands administered by the BLM except as indicated in the management plan for the specific project. Upon completion of the work, all unused materials and all containers will be immediately removed from the area.
13. After rinsing, metal containers will be taken to an authorized dump site for disposal by the dump operator. Paper containers will be completely burned at a site identified by the project management plan or taken to an authorized dump site for disposal by the dump operator.
14. Water samples will be taken before, during, and at designated intervals following treatment operations. Samples will be tested by an approved laboratory for presence and quantity, if any, of chemicals used.
15. All chemical treatment operations will be under the direct supervision of a certified herbicide applicator.

Planning

All areas scheduled for chemical application for the purpose of site preparation or release will have a treatment plan prepared for each project. The plan will:

1. Comply with the Environmental Protection Agency (EPA) labels for the chemical(s) used.
2. Comply with the specifications listed above.
3. Comply with current EPA and State of California, Department of Food and Agriculture rules and regulations.

Operations

Treatment operations will be conducted in strict compliance with the prescribed plan for the project(s).

APPENDIX 2-3

BLM POLICY ON CONSERVING

SENSITIVE, RARE, THREATENED AND ENDANGERED PLANTS

IN CALIFORNIA

It is Bureau policy to conserve federally and State-listed rare, threatened or endangered plants and to utilize its authorities in furtherance of the purposes of the Endangered Species Act (ESA) of 1973, as amended (16 U.S. C. 1531 et. seq.), and similar State laws. The BLM, through its actions and/or decisions, will not jeopardize the continued existence of any federally listed threatened or endangered plant, nor will it destroy or adversely modify Critical Habitats (as determined by the Fish and Wildlife Service) of any such species.

It is also Bureau policy to conserve sensitive plant species. Plant species known or suspected to occur on public lands and that meet one of the following criteria are to be treated as sensitive: (1) Plants identified as candidates for listing as threatened or endangered by the Fish and Wildlife Service (FWS) in a Federal Register Notice of Review; (2) plants officially proposed for listing as threatened or endangered by the FWS in a Federal Register Notice; or (3) plants not meeting either of the above criteria but which have been designated as sensitive by the State Director. Pending formal listing, all sensitive plants will be afforded the full ESA protection (excluding formal but not informal Section 7 consultation with the FWS), unless the State Director judges on a case-by-case basis that the evidence against listing a particular plant species is sufficient to allow a specific action. The burden of proof against listing and the responsibility for possible subsequent constraints in the event that the FWS does list the species in question lie with the BLM. Pertinent information may come from any source, but it is improbable information on the distribution and abundance of such plants will come in a timely manner from non-Bureau conducted or funded studies. Therefore, the BLM will conduct or contract inventories and studies of candidate threatened and endangered plant species which occur or are likely to occur on public lands. An adequate assessment will be made of the significance of individual populations of these species in the event that action funded or authorized by BLM will impact them.

The State Director may remove a species from the sensitive plant list after a review of information indicates that the species is more common or widespread than previously indicated, thus making it a highly unlikely candidate for listing as threatened or endangered. Reasons for such an action must be fully documented, and removal of a species for this reason must be accompanied by a written request (including the supporting evidence) to FWS that the species be dropped from the candidate list.

Full use should be made of the rare plant information on file at the California Natural Diversity Data Base maintained by the California Department of Fish and Game in Sacramento. This information can prove valuable in determining the distribution of federally and State-listed rare, threatened and endangered plants, as well as sensitive plants. This information is, however, not a substitute for on-the-ground field work where data gaps exist. It should be recognized that the more information collected on factors such as the distribution, abundance, ecology and population dynamics of these plants species, the easier it will be for the decision maker to

evaluate the overall impacts of a particular action to a species. District Managers should ensure that all new distributional data on listed or sensitive plants be submitted to the California Natural Diversity Data Base using forms they have provided. This will allow other agencies, as well as other BLM offices, easy access to newly gathered data.

The objectives of all programs will include the means to conserve federally and State-listed plants, to promote their delisting and/or to maintain or enhance the ecosystem on which they depend. Objectives with regard to sensitive plants will be similar, with the emphasis on making their official listing unnecessary.

BLM efforts on behalf of all such plants will be fully coordinated with the Regional Office of the FWS, appropriate offices of other Federal agencies, State agencies, local conservation organizations, and other groups or private citizens, particularly landowners with holdings adjacent to public lands where sensitive, rare, threatened or endangered plants occur.

APPENDIX 2-4

POLICY STATEMENT: SENSITIVE SPECIES MANAGEMENT

1. POLICY

It is Bureau of Land Management (BLM) policy to ensure that the crucial habitats of sensitive species will be managed to minimize the need for listing those species by either the Federal or California State Government in the future (BLM Manual Section 6840).

This policy is a part of the implementation of BLM's on-the-ground multiple-use planning and management processes (MFP, RMP, HMP, AMP, EAR, EIS, etc.). This policy does not necessarily eliminate other uses of sensitive species' crucial habitats, but consideration of sensitive species habitats must be included in all decisions affecting the public lands. Where downward trends in population numbers and habitat conditions exist, positive management actions, such as development of HMPs, are appropriate. Where project impacts to sensitive species cannot be avoided, it may be appropriate to mitigate or compensate for those impacts elsewhere within the species' range in California.

This policy will integrate with, but not supersede, previous memoranda concerning sensitive plants, i.e., WO-80-722 (including Change 1) and CA-80-256.

2. BACKGROUND

The Endangered Species Act (ESA) of 1973 (as amended) directs the designation, conservation, and management of officially listed threatened and endangered plants and wildlife and their Critical Habitats. The management of such species and habitats is nondiscretionary and often restrictive in terms of management options.

Although only threatened and endangered species are addressed specifically in the ESA, it is within the overall intent of that act to manage other plants and wildlife so as to minimize the need for additional listings. Congress has indicated its concern for these other species through the referencing of several acts, conventions, and treaties within subsection 2(a) of the ESA. There is an implied commitment to the conservation of all plants and wildlife and their habitats so as to prevent additional listings. From this commitment to unlisted species has arisen the sensitive species concept.

3. GOAL

The goal is to manage the public lands so as to prevent deterioration of sensitive species' habitat thereby precluding the need for State or Federal listing of those species. This goal includes the following objectives:

- A. Recognize certain sensitive species of plants and wildlife which merit special attention in the management of the public lands.

- B. Minimize the decline of those species designated as sensitive through the mitigation of resource management impacts.
- C. Promote the enhancement of sensitive species through positive management of their habitats and populations.

WILD AND SCENIC RIVER GUIDELINES

39454

Federal Register / Vol. 47, No. 173 / Tuesday, September 7, 1982 / Notices

DEPARTMENT OF THE INTERIOR**Office of the Secretary****National Park Service****DEPARTMENT OF AGRICULTURE****Office of the Secretary****Forest Service****National Wild and Scenic Rivers System; Final Revised Guidelines for Eligibility, Classification and Management of River Areas**

AGENCY: National Park Service and Office of the Secretary, Interior; Forest Service and Office of the Secretary, USDA.

ACTION: Publication of final revised guidelines.

FOR FURTHER INFORMATION CONTACT: Bob Brockwehl (NPS), 202/272-3566. William R. Snyder (USFS), 202/382-8014.

SUPPLEMENTARY INFORMATION:

Guidelines for the study of potential national wild and scenic rivers and management of designated rivers were first issued jointly by the Department of Agriculture and the Department of the Interior in 1970. On January 28, 1981 draft revised guidelines were published in the *Federal Register* for public comment (Vol. 46, No. 18, pp. 9148-9158). The document which follows was prepared after consideration of 50 letters of comment received from other Federal agencies, State governments, private industry, citizens' groups and individuals. Major comments and responses are summarized below. Many of the comments received were not addressed because they related to aspects of the wild and scenic rivers program beyond the scope of these guidelines. (See Preface of the revised guidelines.)

Comments and Responses

Comment: The definition of the term outstandingly remarkable value is too vague and too liberal. Too many rivers will be eligible for designation, unreasonably constraining economic development of natural resources. *Response:* Balancing of the need for protection versus development of each river area will be considered by the Congress in deciding whether or not to designate the river area. A determination that a particular river is eligible for designation does not necessarily imply that designation is the best use of the river in terms of the national interest.

Comment: The guidelines give inadequate emphasis to public

involvement in the study process.

Response: Public involvement is sufficiently addressed in the context of environmental statements or assessments prepared in the study process.

Comment: The guidelines do not make sufficiently clear which of the management principles apply to private lands. *Response:* The guidelines may be unclear to the general reader in this respect. The management principles are to be implemented throughout each river area to the fullest extent possible under the managing agency's general statutory authorities and other existing Federal, State and local laws, including zoning ordinances where available. Some management principles obviously apply only to Federal lands within the river area. For instance, the Wild and Scenic Rivers Act does not open private lands to public recreation. Management principles may apply to private lands only to the extent required by other laws such as local zoning and air and water pollution regulations.

Comment: Restriction of timber harvest to selective harvest techniques is unnecessarily limiting from both the timber production and the natural resource preservation standpoints. *Response:* The guidelines have been amended in accordance with this comment.

Comment: Specific guidance contained in the 1970 guideline with respect to the granting of rights-of-way for transmission lines is omitted from the revised draft guidelines. *Response:* The subsection on rights-of-way has been amended in accordance with this comment.

Comment: A protected study area extending one half mile from each bank of the river is excessive when the final boundaries of a river area must average no more than one quarter mile from each bank (320 acres per mile). *Response:* The half-mile figure was intended to ensure that all areas likely to be included within the boundaries of a designated river area would be considered in the study process. Setting a study boundary based on the "visual corridor" concept was considered but rejected. The one-quarter-mile figure was finally selected to avoid unnecessary limitations on resource developments. Some developments which may be initiated beyond the one-quarter-mile boundary during the study period might be affected in the future if the area under development is included in the boundaries of the river area designated by Congress.

Comment: Evaluation of the study area in its existing condition for classification purposes does not allow

for the fact that a forest area growing in relatively natural condition at the time of the study may be scheduled for clearcutting at some future date. The classification process should allow for authorized and scheduled future uses which could change the condition and, thus, the classification of the river area. *Response:* The guidelines have been amended to permit consideration of alternative classifications for the river area where authorized future uses could alter classification.

The following additional changes were made in response to suggestions from the reviewing public or from reviewers within the responsible agencies.

- Unnecessary definitions were deleted.
- Quotations and paraphrases of the Wild and Scenic River Act (including the whole of Section II—Policy) were eliminated as much as possible. Instead, the guidelines will reference the appropriate sections of the Act where necessary.
- The entire subsection titled "Findings and Recommendations" and portions of the subsection titled "General Management Principles" were deleted and their content was placed in other appropriate sections.

Additional copies of the guidelines, the Wild and Scenic Rivers Act, as amended, and further information on the National Wild and Scenic Rivers System may be obtained from: National Park Service, Rivers and Trails Division (780), 440 G Street, N.W., Washington, D.C. 20243.

Dated: July 12, 1982.

G. Ray Arnett,

Assistant Secretary for Fish and Wildlife and Parks (Interior).

Dated: August 26, 1982.

Douglas W. MacCleery,

Deputy Assistant Secretary for Natural Resources and Environment (Agriculture).

Department of Agriculture

Department of the Interior

National Wild and Scenic Rivers System
Guidelines for Eligibility, Classification
and Management of River Areas.

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Preface

The National Wild and Scenic Rivers System

The Wild and Scenic Rivers Act, (Pub. L. 90-542 as amended; 16 U.S.C. 1271-1287) established a method for providing Federal protection for certain of our country's remaining free-flowing rivers, preserving them and their immediate environments for the use and enjoyment of present and future generations. Rivers are included in the system so that they may benefit from the protective management and control of development for which the Act provides.

The preamble of the Act states:

It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.

Addition of Rivers to the System

The Wild and Scenic Rivers Act provides two methods for adding a river to the National Wild and Scenic Rivers System. The first method is by an act of Congress. Congress can designate a river directly or it can authorize a river for study as a potential wild, scenic or recreational river. Upon completion of a study conducted by the Department of the Interior or the Department of Agriculture, a study report is prepared

and transmitted to the President who, in turn, forwards it with his recommendations to Congress for action.

The second method for inclusion of a river in the national system is through the authority granted to the Secretary of the Interior in section 2(a)(ii) of the Act. Upon application by the Governor or Governors of the State or States involved, the Secretary can designate a river as a component of the national system provided that the river has been designated as a wild, scenic or recreational river by or pursuant to an act of the legislature of the State or States through which it flows to be permanently administered as a wild, scenic, or recreational river by an agency or political subdivision of the State or States concerned.

To be eligible for inclusion in the system through either method, rivers must meet certain criteria set forth in section 2(b) of the Act. Procedures for proposing State-administered rivers for designation have been issued by the Department of the Interior.

The Guidelines

Subsequent to enactment of the Wild and Scenic Rivers Act in October 1968, the Departments of Agriculture and the Interior initiated studies of twenty-seven rivers which the Act authorized for study as potential additions to the National Wild and Scenic Rivers System. As these studies progressed, it became evident that specific requirements of the Act concerning the evaluation, classification and management of these rivers were subject to differing interpretations within and between the two departments.

It was therefore agreed that a uniform evaluation and management approach should be formulated for use by the two departments, and through a cooperative effort, *Guidelines for Evaluating Wild, Scenic and Recreational River Areas Proposed for Inclusion in the National Wild and Scenic Rivers System Under Section 2, Public Law 90-542* was prepared and promulgated in February 1970.

The guidelines not only provide guidance for the congressionally mandated studies under section 5(a) of the Act, but are also useful for evaluations conducted by water resource development agencies under section 5(d) and for States applying for inclusion of State-designated rivers in the national system.

Revision of the Guidelines

While these guidelines were effective throughout a decade, it became clear

that revision was necessary to incorporate changes identified through use and to reflect requirements of new laws and regulations. Therefore, on August 2, 1979, the President directed in his Environmental Message that "the Secretary of Agriculture and the Secretary of the Interior shall jointly revise their guidelines for evaluating wild, scenic and recreational rivers to ensure consideration of river ecosystems and to shorten the time currently used to study rivers for designation."

This revision of the guidelines has been prepared in response to the President's 1979 directive and includes:

- Clarification of the fact that free-flowing rivers which contain outstandingly remarkable ecological values are eligible for addition to the national system.
- Clarification of the fact that free-flowing river segments in or near urban areas that possess outstandingly remarkable values are eligible for addition to the national system.
- Elimination of the 25-mile minimum length guideline.
- Revision of the definition of sufficient river flow or volume of water in the river. Sufficient flow was not defined in the Act and the definition in the existing guidelines was unnecessarily limiting.
- Revised water quality guidelines to allow inclusion in the system of rivers where restoration to high water quality is planned.
- A revised section on management of designated river areas.
- A study schedule to accelerate completion of the river studies authorized by Congress.

Section I—Definitions

The following definitions are provided for the purpose of these guidelines only.

Act: The Wild and Scenic Rivers Act.

Carrying capacity: The quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety.

Classification criteria: Criteria specified in Section 2(b) of the Act for determining the classification (wild, scenic or recreational) of eligible river segments.

Classification: The process of determining which of the classes outlined in section 2(b) of the Act (wild, scenic, or recreational) best fit the river or its various segments.

Component: A river area designated as a unit of the National Wild and Scenic Rivers System.

Designation: Inclusion of a river area in the national system either by act of Congress or by authority of the Secretary of the Interior.

Development: Any manmade structure or modification of the natural or existing river environment.

Eligibility: Qualification of a river for inclusion in the national system through determination that it is free-flowing and with its adjacent land area possesses at least one outstandingly remarkable value.

Flow: The volume of water in a river passing a given point in a given period of time, usually expressed in terms of cubic feet per second or cubic meters per second.

Impoundment: A body of water formed by any manmade structure.

Management plan: The detailed development plan required under section 3(b) of the Act which states the boundaries and classification of the river area and presents a plan for its public use, development and administration.

Primary contact recreation: Activities in which there is prolonged and intimate contact with the water, (e.g., swimming, water skiing, surfing, kayaking, "tubing," and wading or dabbling by children.

River area: For a river study, that portion of a river authorized by Congress for study and its immediate environment comprising an area extending at least one-quarter mile from each bank. For designated rivers, the river and adjacent land within the authorized boundaries.

Secondary contact recreation: Activities in which contact with the water is either incidental or accidental, e.g., boating, fishing and limiting contact with water incident to shoreline activities.

Study agency: The agency within the Department of Agriculture or the Department of the Interior delegated the responsibility for a wild and scenic river study.

Study report: The report on the suitability or unsuitability of a study river for inclusion in the national system, which section 4(a) requires the Secretary of Agriculture, or the Secretary of the Interior, or both jointly to prepare and submit to the President. The President transmits the report with his recommendation to the Congress.

Study team: A team of professionals from interested local, State and Federal agencies invited by the study agency and participating in the study.

Section II—The River Study

The Study Process

Section 4(a) mandates that all rivers designated as potential additions to the system in section 5(a) be studied as to their suitability for inclusion in the system:

The Secretary of the Interior or, where national forest lands are involved, the Secretary of Agriculture or, in appropriate cases, the two Secretaries jointly shall study and submit to the President reports on the suitability or unsuitability for addition to the national wild and scenic rivers system of rivers which are designated herein or hereafter by the Congress as potential additions to such system. The President shall report to the Congress his recommendations and proposals with respect to the designation of each such river or section thereof under this Act.

The purpose of a wild and scenic river study is to provide information upon which the President can base his recommendation and Congress can make a decision. Procedures for developing the necessary information and preparing the study report may vary depending on the agency which conducts the study, but generally will include the steps shown on Table 1, Accelerated Study Schedule.

Wild and scenic river studies will comply with all applicable statutes and executive orders, which may include the following: the National Environmental Policy Act (Pub. L. 91-190), the National Historic Preservation Act (Pub. L. 89-665), the Endangered Species Act (Pub. L. 93-205), the Fish and Wildlife Coordination Act (Pub. L. 85-264), the Water Resources Planning Act (Pub. L. 89-80), the Floodplain and Wetlands Executive Orders (E.O. 11988 and E.O. 11990), the National Forest Management Act of 1976 (Pub. L. 94-588), the Federal Land Policy and Management Act of 1976 (Pub. L. 94-579), the Wild and Scenic Rivers Act, (Pub. L. 90-542, as amended), and any rules and regulations issued pursuant thereto.

The Study Report

Each river study report will be a concise presentation of the information required in sections 4(a) and 5(c) of the Act as augmented by the Council on Environmental Quality regulations implementing the procedural provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508).

Section 4(a):

Each report, including maps and illustrations, shall show among other things the area included within the report; the characteristics which do or do not make the area a worthy addition to the system; the current status of land ownership and use in the area; the reasonably foreseeable potential

uses of the land and water which would be enhanced, foreclosed or curtailed if the area were included in the national wild and scenic rivers system; the Federal agency (which in the case of a river which is wholly or substantially within a national forest, shall be the Department of Agriculture) by which it is proposed the area, should it be added to the system, be administered; the extent to which it is proposed that such administration, including the costs thereof, be shared by State and local agencies; and the estimated cost to the United States of acquiring necessary lands and interests in land and of administering the area, should it be added to the system.

In addition, section 5(c) requires that

The study of any of said rivers * * * shall include a determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the national wild and scenic rivers system.

Study reports may be combined with draft and final environmental impact statements (EIS) as permitted by § 1506.4 of the Council on Environmental Quality regulations. Study reports will be reviewed by other Federal agencies, states and the public as required by section 4(b) of the Wild and Scenic Rivers Act. Each of the following subsections describes the way in which the information is generated, analyzed and presented in the report.

Description of the River Area

Each report will contain a description of the area included in the study. The study area will cover, as a minimum, an area extending the length of the river segment authorized for study and extending in width one-quarter mile from each bank of the river.

Adjacent river areas beyond one quarter mile from each river bank may be studied if their inclusion could facilitate management of the resources of the river area. For example, there may be important historic, archeological or ecological resource areas which may extend beyond the boundaries of the mandated study area, but could be better managed by inclusion in the river area. Also, management of the river area may be facilitated by extension to include established or available access points not included in the study.

For the purposes of study and determining eligibility and classification, the river area may be divided into segments.

The description of the river area will identify the outstandingly remarkable values and the extent of man's activity in the river environment to provide a clear basis for findings of eligibility and classification. While only one

outstandingly remarkable value is necessary for eligibility, the study report should carefully document all values of the river area.

In addition to the information required by Sections 4(a) and 5(c) of the Act, this section of the report will describe any existing zoning ordinances or other provisions of law governing land use in the study area.

If the study report and the environmental impact statement are combined, the same chapter may describe both the river area and the affected environment. For EIS purposes and for general information, a brief description of the regional setting will also be included.

Determination of Eligibility

Each report will contain a determination as to the eligibility of all portions of the authorized study area.

Section 2(b) of the Act states that "a * * * river area eligible to be included in the system is a free-flowing stream and the related adjacent land area that possesses one or more of the values referred to in section 1, subsection (b) of this Act." The terms "river" and "free-flowing" are defined in section 18 of the act.

In reading and applying the criteria for eligibility, the following points are relevant:

- The fact that a river segment may flow between large impoundments will not necessarily preclude its designation. Such segments may qualify if conditions within the segment meet the criteria.
- Rivers or river segments in or near urban areas that possess outstandingly remarkable values may qualify. Only one outstandingly remarkable value is needed for eligibility.
- In addition to the specific values listed in Section 1(b) of the Act, other similar values, such as ecological, if outstandingly remarkable, can justify inclusion of a river in the national system.
- The determination of whether a river area contains "outstandingly remarkable" values is a professional judgment on the part of the study team. The basis for the judgment will be documented in the study report.
- There are no specific requirements concerning the length or the flow of an eligible river segment. A river segment is of sufficient length if, when managed as a wild, scenic or recreational river area, the outstandingly remarkable values are protected. Flows are sufficient if they sustain or complement the

outstandingly remarkable values for which the river would be designated.

Classification

Study reports will indicate the potential classification which best fits each eligible river segment as viewed in its existing condition. Section 2(b) of the Act states that rivers which are found eligible and included in the National Wild and Scenic Rivers Systems shall be classified as one of the following:

(1) Wild river areas—Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

These criteria are interpreted as follows:

a. "Free of impoundments." Wild river areas shall be free of impoundments.

b. "Generally inaccessible except by trail." Wild river areas will not contain roads, railroads, or other provisions for vehicular travel within the river area. The existence of a few inconspicuous roads leading to the boundary of the river area at the time of study will not necessarily bar wild river classification.

c. "Watersheds or shorelines essentially primitive." Wild river areas will show little or no evidence of human activity. Shorelines and watersheds within the river area should be essentially free of structures including such things as buildings, pipelines, powerlines, dams, pumps, generators, diversion works, rip-rap and other modifications of the waterway or adjacent land within the river corridor. The existence of a few inconspicuous structures, particularly those of historic or cultural value, at the time of study need not bar wild classification.

A limited amount of domestic livestock grazing or hay production may be considered "essentially primitive." There should be no row crops or ongoing timber harvest and the river area should show little or no evidence of past logging activities.

d. "Waters unpolluted." The water quality of a wild river will meet or exceed Federal criteria or federally approved State standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the stream, and for primary contact recreation except where exceeded by natural conditions.

(2) Scenic river areas—Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

These criteria are interpreted as follows:

a. "Free of impoundments." Scenic river areas will be free of impoundments.

b. "Shorelines or watersheds still largely primitive." To qualify for scenic classification, the river segment's shorelines and immediate environment should not show substantial evidence of human activity. The portion of the watershed within the boundary of the scenic river may have some discernible existing development. "Largely primitive" means that the shorelines and the immediate river environment still present an overall natural character, but that in places land may be developed for agricultural purposes. Row crops would be considered as meeting the test of "largely primitive," as would timber harvest and other resource use, providing such activity is accomplished without a substantial adverse effect on the natural appearance of the river or its immediate environment.

c. "Shorelines largely undeveloped" means that any structures or concentration of structures must be limited to relatively short reaches of the total area under consideration for designation as a scenic river area.

d. "Accessible in places by road" means that roads may reach the river area and occasionally bridge the river. The presence of short stretches of conspicuous or longer stretches of inconspicuous and well-screened roads or railroads will not necessarily preclude scenic river designation. In addition to the physical and scenic relationship of the free-flowing river area to roads or railroads, consideration should be given to the type of use for which such roads or railroads were constructed and the type of use which would occur within the proposed scenic river area.

(3) Recreational river areas—Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

These criteria are interpreted as follows:

a. "Readily accessible by road or railroad." River areas classified as recreational may contain existing parallel roads or railroads in close proximity to one or both banks of the river as well as bridge crossings and roads fording or ending at the river.

b. "Some development along their shorelines." Lands may have been developed for the full range of agricultural and forestry uses, may show evidence of past and ongoing timber

harvest, and may include some residential, commercial or similar development.

c. "Some impoundment or diversion in the past." There may be some existing impoundments, diversions and other modifications of the waterway having an impact on the river area. Existing low dams, diversion works, rip-rap and other minor structures will not bar recreational classification, provided the waterway remains generally natural and riverine in appearance.

The classification criteria are summarized in Table 2, appended to these guidelines.

There are several points which all participants and observers of the study process should bear in mind when reading and applying the classification criteria:

- It is important to understand each criterion, but it is more important to understand their collective intent. Each river segment and its immediate environment should be considered as a unit. The basis for classification is the degree of naturalness, or stated negatively, the degree of evidence of man's activity in the river area. The most natural rivers will be classified wild; those somewhat less natural, scenic, and those least natural, recreational.

Generally, only conditions within the river area determine classification; however, occasionally conditions outside the river area, such as developments which could impact air and water quality, noise levels or scenic views within the river area, may influence classification. For the purpose of classification, a river area may be divided into segments. Each segment, considered as a whole, will conform to one of the classifications. In segmenting the river the study team should take into account the management strategies necessary to administer the entire river area and should avoid excessive segmentation.

The Wild and Scenic Rivers Act provides no specific guidance on water quality for scenic and recreational rivers. However, the Clean Water Act has made it a national goal that all waters of the United States be made fishable and swimmable, and provides the legal means for upgrading water quality in any river which would otherwise be suitable for inclusion in the system. Therefore, rivers will not necessarily be excluded from the system because of poor water quality at the time study, provided a water quality improvement plan exists or is being

developed in compliance with applicable State and Federal laws.

- Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.
- The classification criteria provide uniform guidance for professional judgment, but they are not absolutes. It is not possible to formulate criteria so as to mechanically or automatically classify river areas. Therefore, there may occasionally be exceptions to some of the criteria. For example, if the study team finds that strict application of the statutory classification criteria would not provide the most appropriate classification for a specific river segment, the study report may recommend for congressional consideration an exception to the classification criteria.

Analysis of the Alternatives

To provide for decisionmaking and to satisfy the requirements of the National Environmental Policy Act, study reports will include an analysis of alternatives. The study team will develop an array of alternative plans encompassing all reasonable proposals for use of the river area including uses which may be incompatible with designation of the river area as a component of the national system. Where appropriate, alternative plans for the river area may be based on, but not limited to:

- Alternative managing agencies for the river area;
- Alternative protective measures other than national designation;
- Alternative uses of the area incompatible with designation as a component of the national system; and
- Alternative classifications for the river area. Occasionally there may be authorized but not yet constructed projects, which if constructed would alter the classification of the river area. In such cases, alternatives may be presented to permit consideration of the river area as it would be classified both with and without the authorized project. Authorized projects may include approved land management plans prepared by a Federal land management agency under its statutory authorities.

The study report will present at least one alternative plan calling for national designation through either Congressional or Secretarial designation of all eligible segments of the congressionally authorized study area.

If the study team finds a segment ineligible for designation as a

component of the National Wild and Scenic Rivers System, but still worthy of protection, alternatives for State, local or private preservation may be presented, as well as protection under other Federal programs.

If areas adjacent to the study area have been studied and found eligible, the report may present alternatives which incorporate such areas into the river area proposed for designation. Such expansion of the original study area either in length or in width may be desirable to preserve and facilitate management of river ecosystems, historic or archeological areas or other special areas.

Section III—Management

Wild and scenic rivers shall be managed with plans prepared in accordance with the requirements of the Act, other applicable laws, and the following general management principles. Management plans will state: General principles for any land acquisition which may be necessary; the kinds and amounts of public use which the river area can sustain without impact to the values for which it was designated; and specific management measures which will be used to implement the management objectives for each of the various river segments and protect esthetic, scenic, historic, archeologic and scientific features.

If the classification or classifications determined in the management plan differ from those stated in the study report, the management plan will describe the changes in the existing condition of the river area or other considerations which required the change in classification.

General Management Principles

Section 10(a) states,

Each component of the national wild and scenic rivers system shall be administered in such a manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development on the special attributes of the area.

This section is interpreted as stating a nondegradation and enhancement policy for all designated river areas, regardless of classification. Each component will be managed to protect and enhance the values for which the river was designated, while providing for public

recreation and resource uses which do not adversely impact or degrade those values. Specific management strategies will vary according to classification but will always be designed to protect and enhance the values of the river area. Land uses and developments on private lands within the river area which were in existence when the river was designated may be permitted to continue. New land uses must be evaluated for their compatibility with the purposes of the Act.

The management principles which follow stem from section 10(a). Managing agencies will implement these principles to the fullest extent possible under their general statutory authorities and existing Federal, State and local laws. Because of these limitations, however, implementation of the principles may differ among and within components of the system depending on whether the land areas involved are federally, State, locally or privately owned.

Carrying Capacity. Studies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly.

Public Use and Access. Public use will be regulated and distributed where necessary to protect and enhance (by allowing natural recovery where resources have been damaged) the resource values of the river area. Public use may be controlled by limiting access to the river, by issuing permits, or by other means available to the managing agency through its general statutory authorities.

Basic Facilities. The managing agency may provide basic facilities to absorb user impacts on the resource. Wild river areas will contain only the basic minimum facilities in keeping with the "essentially primitive" nature of the area. If facilities such as toilets and refuse containers are necessary, they will generally be located at access points or at a sufficient distance from the river bank to minimize their intrusive impact. In scenic and

recreational river areas, simple comfort and convenience facilities such as toilets, shelters, fireplaces, picnic tables and refuse containers are appropriate. These, when placed within the river area, will be judiciously located to protect the values of popular areas from the impacts of public use.

Major Facilities. Major public use facilities such as developed campgrounds, major visitor centers and administrative headquarters will, where feasible, be located outside the river area. If such facilities are necessary to provide for public use and/or to protect the river resource, and location outside the river area is infeasible, such facilities may be located within the river area provided they do not have an adverse effect on the values for which the river area was designated.

Motorized Travel. Motorized travel on land or water is generally permitted in wild, scenic and recreational river areas, but will be restricted or prohibited where necessary to protect the values for which the river area was designated.

Agricultural and Forestry Practices. Agricultural and forestry practices should be similar in nature and intensity to those present in the area at the time of designation. Generally, uses more intensive than grazing and hay production are incompatible with wild river classification. Rowcrop production and timber harvest may be practice in recreational and scenic river areas. Recreational river areas may contain an even larger range of agricultural and forestry uses. Timber harvest in any river area will be conducted so as to avoid adverse impacts on the river area values.

Other Resource Management Practices. Resource management practices will be limited to those which are necessary for protection, conservation, rehabilitation or enhancement of the river area resources. Such features as trail bridges, fences, water bars and drainage ditches, flow measurement devices and other minor structures or management practices are permitted when compatible with the classification of the river area and provided that the area remains natural in appearance and the practices or structures harmonize with the

surrounding environment.

Water Quality. Consistent with the Clean Water Act, water quality in wild, scenic and recreational river areas will be maintained or, where necessary, improved to levels which meet Federal criteria or federally approved State standards for aesthetics and fish and wildlife propagation. River managers will work with local authorities to abate activities within the river area which are degrading or would degrade existing water quality.

Additional management principles stem from other sections of the Act as follows:

Land Acquisition: Section 6
Water Resource Development: Section 7
Mining: Section 9
Management of Adjacent Federal Lands: Section 12(a)
Hunting and Fishing: Section 13(a)
Water Rights: Section 13(b)-(f)
Rights-of-Way: Section 13(g)

The following policies are consistent with and supplement the management principles stated in the Act:

Land Use Controls. Existing patterns of land use and ownership should be maintained, provided they remain consistent with the purposes of the Act. Where land use controls are necessary to protect river area values, the managing agency will utilize a full range of land-use control measures including zoning, easements and fee acquisition.

Rights-of-Way. In the absence of reasonable alternative routes, new public utility rights-of-way on Federal lands affecting a Wild and Scenic River area or study area will be permitted. Where new rights-of-way are unavoidable, locations and construction techniques will be selected to minimize adverse effects on scenic, recreational, fish and wildlife and other values of the river area.

Other legislation applicable to the various managing agencies may also apply to wild and scenic river areas. Where conflicts exist between the provisions of the Wild and Scenic Rivers Act and other acts applicable to lands within the system, the more restrictive provisions providing for protection of the river values shall apply.

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TABLE 1.
ACCELERATED STUDY SCHEDULE

MONTHS

River Study Tasks	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
1. Organize study team Prepare study plan Public information meetings Scope critical issues																														
2. Resource Inventories (a) Study Endry. Locations (b) River eligibility and classification evalu. (c) Literature search (d) Other agency contacts (a) Resource maps																														
3. Develop alternative (a) Prepare alternatives display (b) Public meetings on findings and alternat. (c) Analyze Public Input (d) Evaluate alternatives																														
4. Complete Preliminary Report/ DEIS																														
5. Review of Draft (a) Internal Review (b) Revise Preliminary as needed (c) Prepare camera ready copy (d) Print Draft Report/EIS (a) Distribute for 90-day review (a) Public meetings or formal hearings during review																														
6. Analyze Review Input Revise draft as needed. Internal Review																														
7. Print Final Report																														
8. Secretary's decision and transmittal of report w/ recommendations to OMB																														
9. Executive review and transmittal to the Congress																														

This schedule does not take into account the possibility of delays due to Congressional concern, interagency or intradepartmental concerns or other possible outside influences that cannot be planned for.

TABLE 2.

CLASSIFICATION CRITERIA FOR WILD, SCENIC AND RECREATIONAL RIVER AREAS *

ATTRIBUTE	WILD	SCENIC	RECREATIONAL
Water Resources Development	Free of impoundment.	Free of impoundment.	Some existing impoundment or diversion. The existence of low dams, diversions or other modifications of the waterway is acceptable, provided the waterway remains generally natural and riverine in appearance.
Shoreline Development	Essentially primitive. Little or no evidence of human activity. The presence of a few inconspicuous structures, particularly those of historic or cultural value, is acceptable. A limited amount of domestic livestock grazing or hay production is acceptable. Little or no evidence of past timber harvest. No ongoing timber harvest.	Largely primitive and undeveloped. No substantial evidence of human activity. The presence of small communities or dispersed dwellings or farm structures is acceptable. The presence of grazing, hay production or row crops is acceptable. Evidence of past or ongoing timber harvest is acceptable, provided the forest appears natural from the riverbank.	Some development. Substantial evidence of human activity. The presence of extensive residential development and a few commercial structures is acceptable. Lands may have been developed for the full range of agricultural and forestry uses. May show evidence of past and ongoing timber harvest.
Accessibility	Generally inaccessible except by trail. No roads, railroads or other provision for vehicular travel within the river area. A few existing roads leading to the boundary of the river area is acceptable.	Accessible in places by road. Roads may occasionally reach or bridge the river. The existence of short stretches of conspicuous or longer stretches of inconspicuous roads or railroads is acceptable.	Readily accessible by road or railroad. The existence of parallel roads or railroads on one or both banks as well as bridge crossings and other river access points is acceptable.
Water Quality	Meets or exceeds Federal criteria or federally approved State standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the river, and for primary contact recreation (swimming) except where exceeded by natural conditions.	No criteria prescribed by the Wild and Scenic Rivers Act. The Federal Water Pollution Control Act Amendments of 1972 have made it a national goal that all waters of the United States be made fishable and swimmable. Therefore, rivers will not be precluded from scenic or recreational classification because of poor water quality at the time of their study, provided a water quality improvement plan exists or is being developed in compliance with applicable Federal and State laws.	

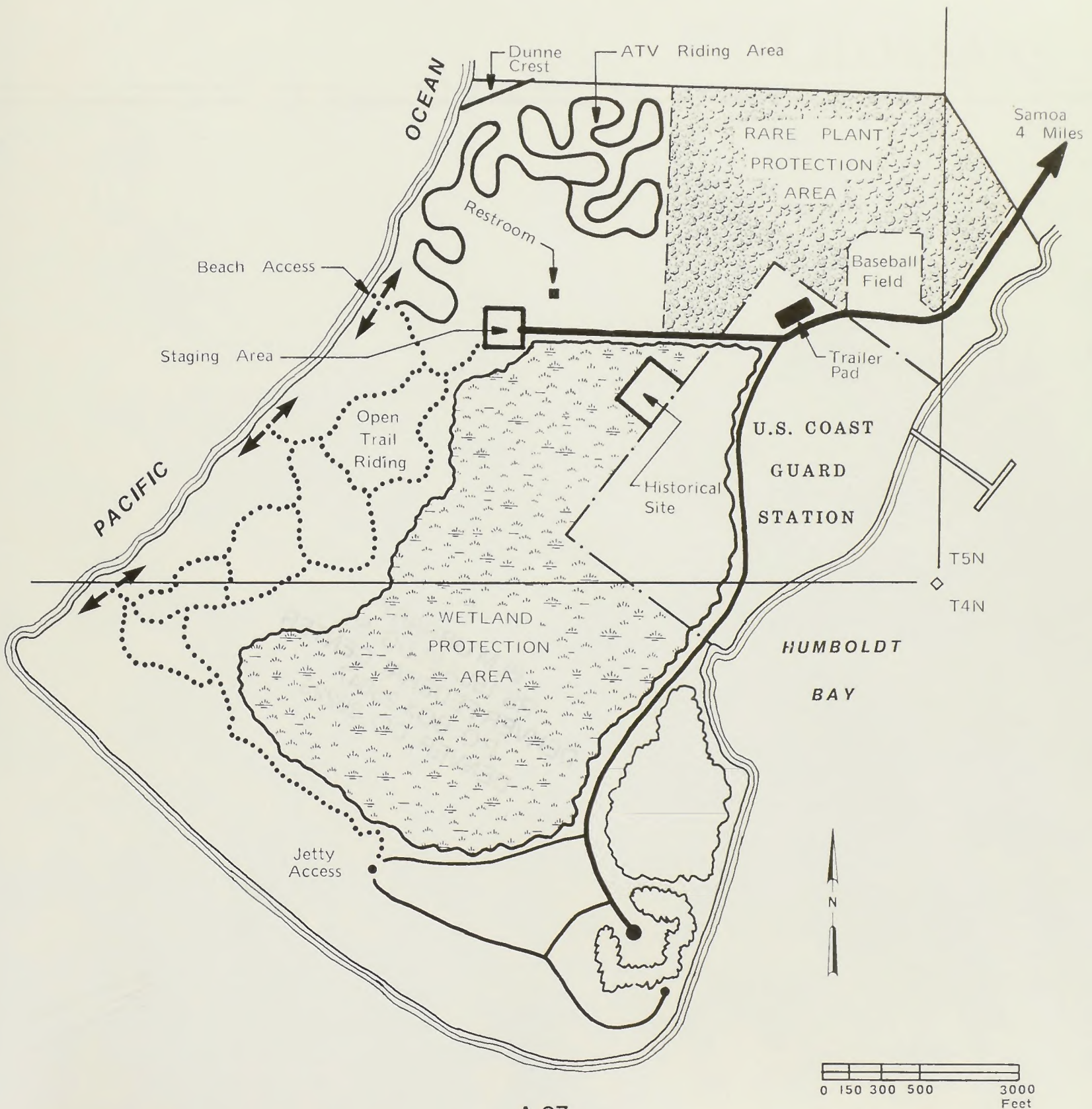
* Table to be used only in conjunction with text.

[FR Doc. 82-24438 Filed 9-3-82; 8:45 am]

BILLING CODE 4310-70-C

SAMOA DUNES ORV PROJECT CONCEPTUAL DEVELOPMENT MAP

APPENDIX 3-1

SAMOA DUNES ORV CONCEPTUAL
DEVELOPMENT MAP

APPENDIX 3-1
SANDIA DUNES ONLY CONCEPTUAL
DEVELOPMENT MAP

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Glossary

GLOSSARY

(INCLUDING ACRONYMS AND ABBREVIATIONS)

ACEC. Area of Critical Environmental Concern. An area within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

ACTIVITY PLAN. A site specific plan for the management of one or more resources (i.e. CMP, AMP). Activity plans implement decisions made in the Resource Management Plan.

ALLOTMENT. An area of land where one or more operators graze their livestock. It generally consists of public lands but may include parcels of private or State-owned lands. The number of livestock and period of use are stipulated for each allotment. An allotment may consist of several pastures or be only one pasture.

AMP. Allotment Management Plan. A concisely written program of livestock grazing manage, including supportive measures if required, designed to attain specific management goals in a grazing allotment. It is prepared with consultation, cooperation, and coordination with the permittee(s), lessee(s), or other affected parties.

AUM. Animal Unit Month. The amount of forage necessary for the complete sustenance of one cow, or its equivalent (one horse or five sheep, all over six months old) for one month; also, a unit of measurement of grazing privilege that represents the privilege of grazing one animal for a period of one month.

ANNUALS. Plants produced from seed which complete their life cycle in one growing season.

ARCHAEOLOGICAL RESOURCES. Sites, areas, structures, objects, or other evidence of prehistoric or historic human activities.

ARCHAEOLOGICAL SITE. Geographic locale containing structures, artifacts, material remains, and/or other evidence(s) of past human activity.

BIOLOGICAL ASSESSMENT. A procedural step in the interagency consultation process under section 7 of the Endangered Species Act where the BLM submits a written summary of potential project impacts to threatened or endangered species to the USFWS for their evaluation.

BMP. Best Management Practice. A practice or combination of practices determined by the State and/or areawide planning agencies, after problem assessment, examination of alternative practices, and appropriate public participation, to be the most effective, practicable means of preventing or reducing pollution generated by non-point sources to a level compatible with water quality standards.

BROWSE. The tender shoots, twigs, and leaves of trees and shrubs often used as food by deer, livestock and other animals; or to feed on or eat browse.

CAMP SITE. Area utilized for one or more tasks, which also shows evidence of occupation by the presence of housepits, midden deposits, and/or hearths.

CARRYING CAPACITY. The maximum stocking rate possible without damaging vegetation or related resources. Carrying capacity may vary from year to year on the same area due to fluctuating forage production caused primarily by differing amounts of precipitation.

CFL. Commercial Forest Land. Forest land that is capable of yielding at least twenty cubic feet of wood per acre per year of commercial coniferous tree species.

CANDIDATE SPECIES. Candidate species are any species not yet officially listed, but this are undergoing a status review or are proposed for listing according to Federal Register notices published by the Secretary of the Interior or the Secretary of Commerce.

CRITICAL HABITAT. Any habitat, which if lost, would appreciably decrease the likelihood of the survival and recovery of a threatened or endangered species, or a distinct segment of its population. Critical habitat may represent any portion of the present habitat of a listed species and may include additional areas for reasonable population expansion. Critical habitat must be officially designated as such by the Fish and Wildlife Service or the National Marine Fisheries Service.

CUMULATIVE IMPACT. The aggregate impact of existing and proposed activities. Individual intrusions when considered by themselves may not impair wilderness suitability, however, when combined with other existing and proposed substantially unnoticeable impacts, the total effect may be sufficient to impair an area's suitability for preservation as wilderness.

CUSTODIAL MANAGEMENT. The opposite of active or intensive management.

DEPENDENCY. The amount of forage provided by public land, expressed as a percentage of herd's total forage requirements for one complete year. The forage requirement is based on the ranch's total herd.

EA. Environmental Assessment.

ECOTONE. The transition zone between two plant communities. Usually this zone embodies some of the features of two communities, but has a characteristic structure of its own. It is usually a belt rather than a sharp line.

EMERGENCY ACTIONS. Operations which are in response to a natural or other type disaster, such as flooding, fires, and earthquakes.

ENDANGERED SPECIES. Any species formally recognized by the U.S. Fish and Wildlife Service as in danger of extinction throughout all or a significant portion of its range.

ESSENTIAL HABITAT. Areas recommended for designation as critical habitat for threatened or endangered species.

FAUNA. The animals of a given region or period.

FORAGE. All browse and herbaceous foods that are available to grazing animals.

GRAZING LEASE. A document authorizing use of the public land for the purpose of grazing livestock.

GUZZLER. A water catchment and storage device utilizing a concrete, asphalt, or steel apron to catch rainfall and a buried tank (usually fiberglass) to store it. Guzzlers usually store about 900-1,000 gallons of water, when full. They are accessible, at ground level to small wildlife, by means of ramp leading into the tank.

HABITAT. A specific set of physical conditions that surround a single species, a group of species, or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover, and living space.

HISTORIC. Refers to period wherein non-native cultural activities took place, based primarily upon European roots, having no origin in traditional Native American culture(s).

INFRASTRUCTURE. The basic, underlying framework or features of something especially of a technological kind, as communication and transport facilities, etc., of an organization.

INHOLDING. A parcel of nonpublic land surrounded by public land.

LEASABLE MINERALS. Those minerals or materials that can be leased from the Federal government. Includes oil and gas, coal, phosphate, sodium, potash, and oil shale.

LITHIC SCATTER. A prehistoric site characterized by a scatter of stone tools and flakes that may indicate a number of functions.

LOCATABLE MINERALS. Minerals or materials subject to disposal and development through the Mining Law of 1872 (as amended). Generally includes metallic minerals such as gold and silver and other materials not subject to lease or sale (some bentonites, limestone, talc, some zeolites, etc.).

MANAGEMENT AREA. A discrete portion of the total planning area that has common features, problems, and/or management needs, that lends itself to specific management decisions.

MBF. Thousand Board Feet. A measure of timber volume.

MIDDEN. Dark-colored soil deposits formed from organic residues remaining from Indian campsites, frequently containing artifactual, faunal, and floral constituents of high scientific value.

MMBF. Million Board Feet.

MONITORING. Specific studies which evaluate the effectiveness of actions taken toward achieving management objectives.

MULTIPLE USE. The management of the public land and its various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife

and fish, and natural scenic, scientific, and historical values, and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.

NRHP. National Register of Historic Places. A register of districts, sites, buildings, structures, and objects, significant in American history, architecture, archaeology, and culture, established by the Historic Preservation Act of 1966 and maintained by the Secretary of the Interior.

OFF-ROAD VEHICLE DESIGNATION. Executive Order 11644 requires that all public land be designated for appropriate levels of ORV use in one of three possible categories: Open, Limited, or Closed.

ONA. Outstanding Natural Area. Area of outstanding scenic splendor or natural wonder that merits special attention and care in management to ensure its preservation in a natural condition.

PERENNIAL. Plants that have a life cycle of three or more years.

PERMITTEE. Holder of a license or permit for grazing on an allotment.

PLANT COVER. The percent of an area covered by any part of living plant material (aerial plant cover), or that percent area occupied by the portion of living plants at the point of emergence from the ground (basal plant cover).

PREHISTORIC. Refers to period wherein Native American cultural activities took place which were not yet influenced by contact with historic non-native culture(s).

PRESCRIBED BURNING. The application of fire to wildland fuels under such conditions of weather, fuels, and topography that specific objectives are accomplished safely.

PUBLIC LAND. Land administered by the Bureau of Land Management.

RANGE IMPROVEMENT. Any activity or program on or relating to rangelands which is designed to improve production of forage, change vegetation composition, control patterns of use, provide water, stabilize soil and water conditions, and provide habitat for livestock, wild free-roaming horses and burros, and wildlife. The term includes but is not limited to structures, treatment projects, and use of mechanical means to accomplish the desired result.

RAPTOR. Birds of prey with sharp talons and strongly curved beaks; e.g., hawks, owls, eagles, falcons.

RIGHT-OF-WAY GRANT. A right attached to the land for use by another party (i.e., utility lines, road, etc.).

RIPARIAN. Situated on or pertaining to the bank of a river, stream, or other body of water. Normally used to refer to the plants of all types that grow rooted in the watertable of streams, ponds, and springs.

RNA. Research Natural Area. As defined in 43 CFR 8223.0-5, means an area that is established and maintained for the primary purpose of research and education because the land has one or more of the following characteristics: a typical representation of common plant or animal association; an unusual plant or animal association; a threatened or endangered plant or animal species; a typical representation of common geologic, soil, or water features; or outstanding or unusual geologic, soil, or water features.

SENSITIVE SPECIES. Animals not yet listed as endangered or threatened, but that are undergoing a status review. This may include animals whose populations are consistently and widely dispersed or whose ranges are restricted to a few localities, so that any major habitat change could lead to extinction. A species that is particularly sensitive to some external disturbance factors.

SIGNIFICANCE. A high degree of importance as indicated by either quantitative measurements or qualitative judgments. Significance may be determined by evaluating characteristics pertaining to location extent, consequences, and duration.

SUSTAINED YIELD. The achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the public land consistent with multiple use. This term is most commonly associated with forest management and the provisions of an undiminished or "even flow" average annual production of wood fiber over decades. It is also applicable to the management of all renewable resources including forage, wildlife, water, recreation, or any value that can be managed for renewal and sustained productivity. It is dependent on the application of multiple use management in a way that assumes the maintenance of the land's productivity.

THREATENED SPECIES. Any species formally recognized by the U.S. Fish and Wildlife Service as likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

TPCC. Timber Production Capability Classification. The process of partitioning forest land into major classes indicating relative suitability to produce timber on a sustained yield basis.

VEGETATION TYPE. A grouping of similar vegetation based on structure, a product of the complex of climatic factors effective in a region.

VISITOR HOURS. Unit of measure for recreation use; one hour spent on public land by one recreationist.

VRM. Visual Resource Management. The planning, design, and implementation of management objectives to provide acceptable levels of visual impacts for all BLM resource management activities. VRM classes I through V each describe a different degree of modification allowed in the basic elements of the landscape and still retain its character.

WATERSHED. The area drained by a river or stream system.

WITHDRAWAL. A formalized action restricting specified land from operation or disposal under specified laws, either mineral laws or land disposal laws, or both. Can also be used to transfer jurisdiction of land to another Federal agency.

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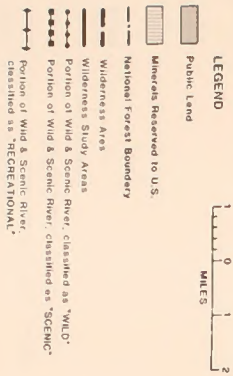
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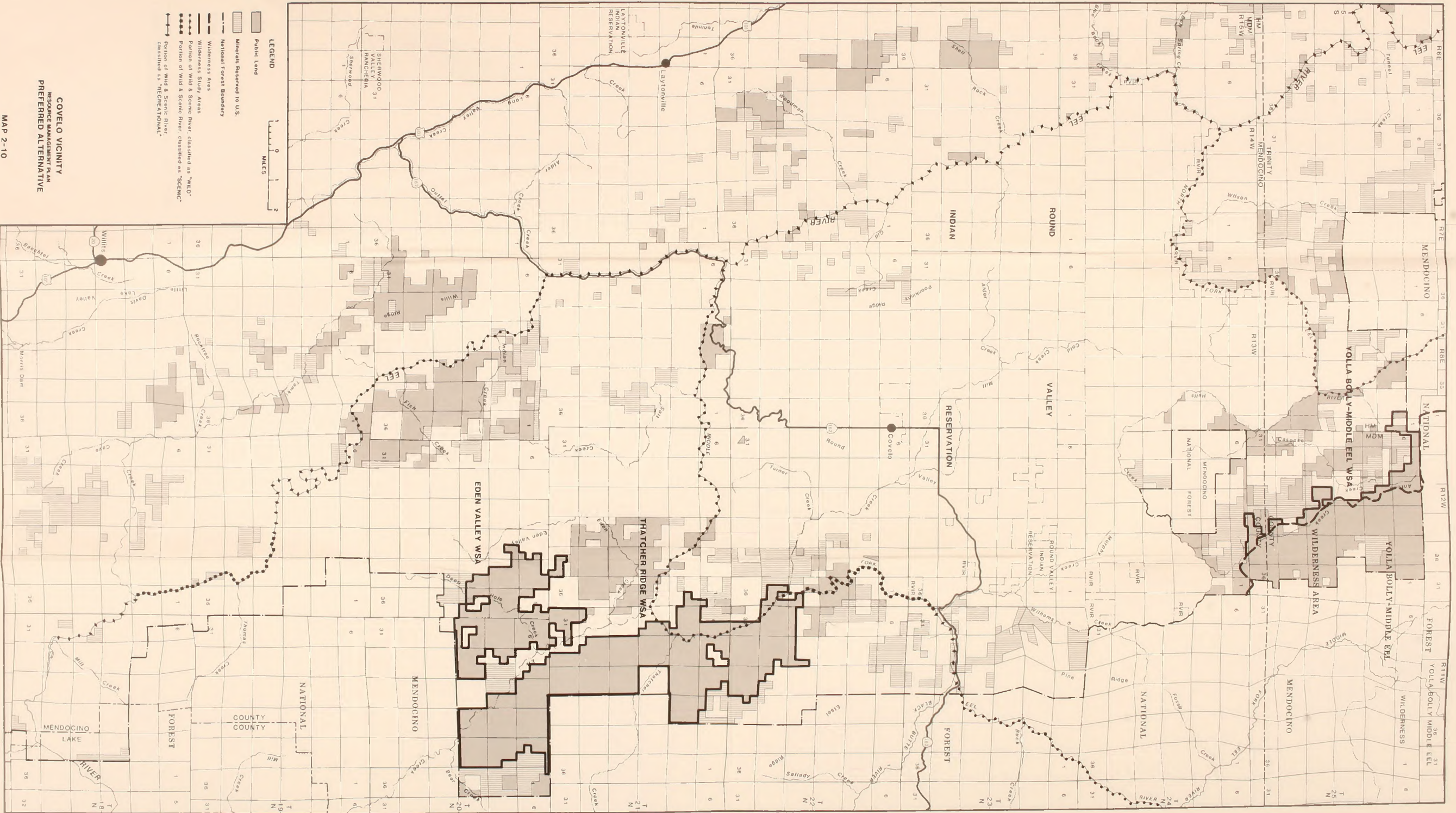
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Minerals Reserved to U.S.

National Forest Boundary

Little Dairy Area

Eden Creek RMA/ACFC

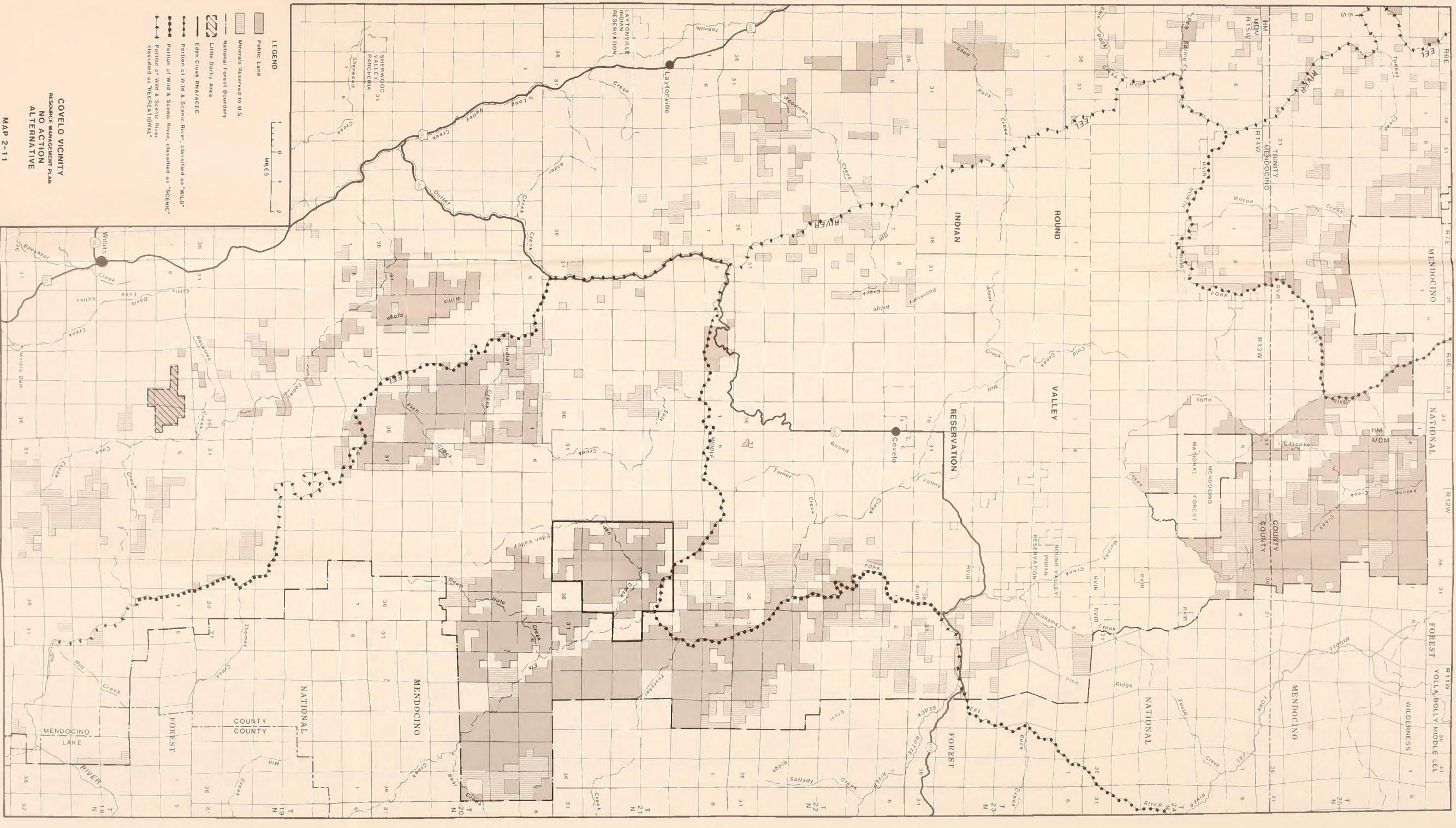
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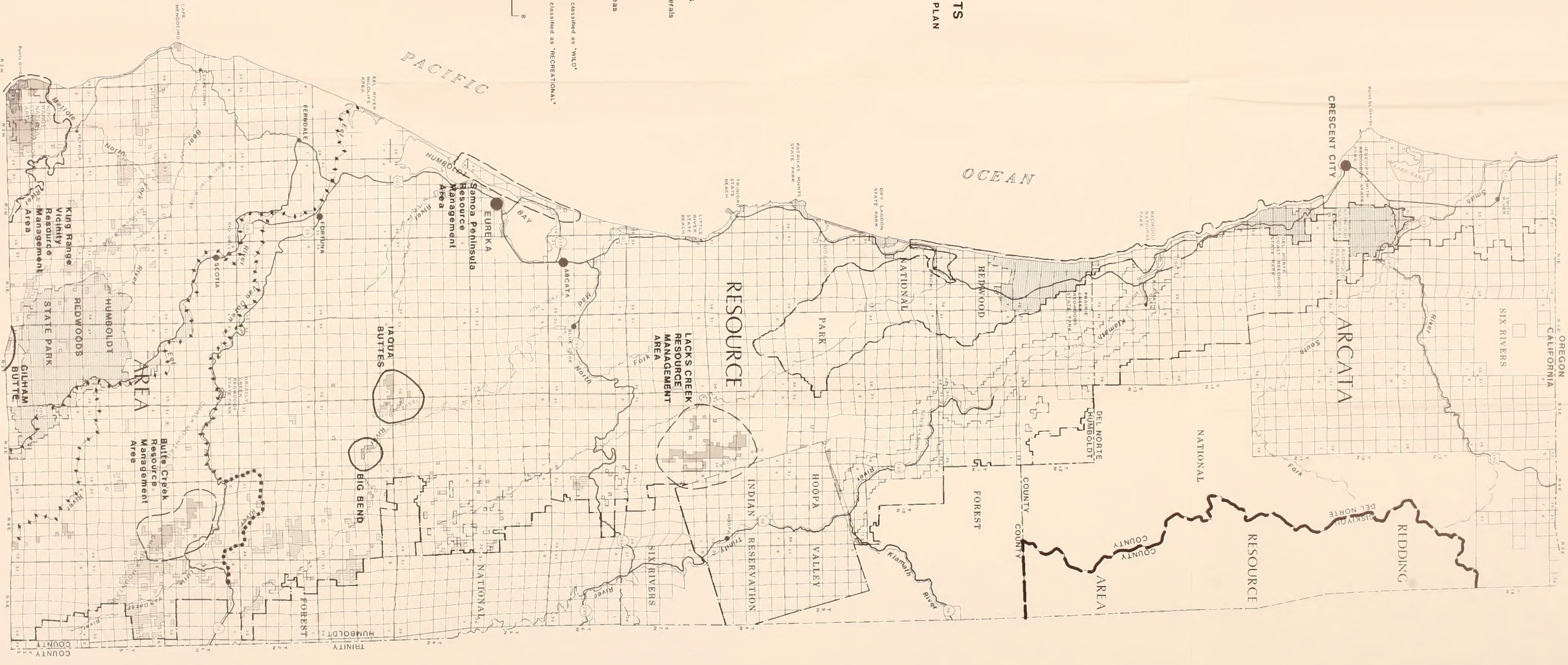
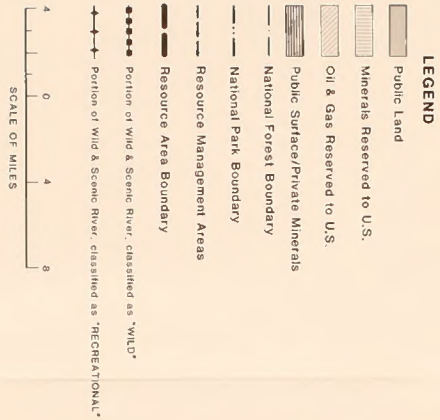
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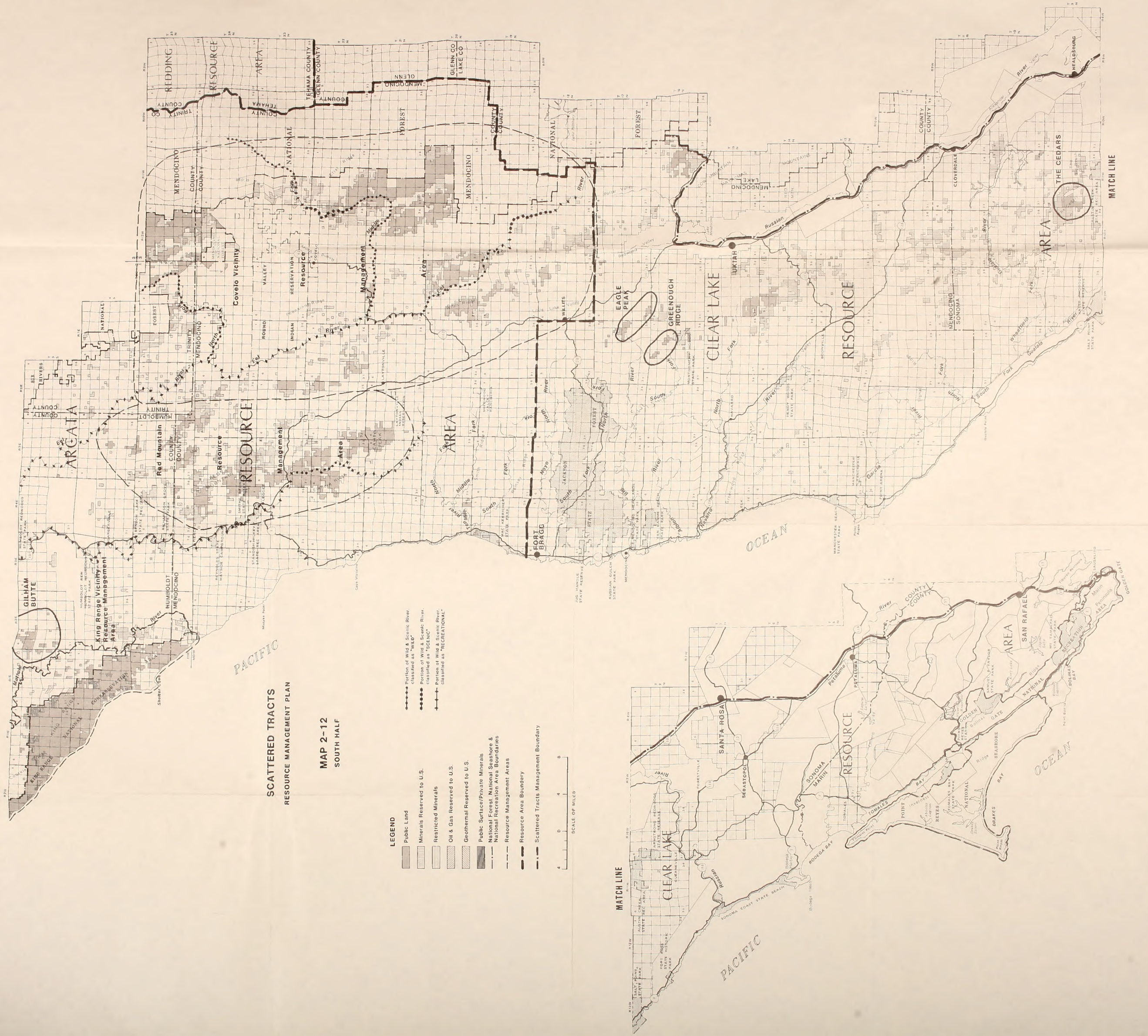
COVELO VICINITY
RESOURCE MANAGEMENT PLAN
NO ACTION
ALTERNATIVE



SCATTERED TRACTS
RESOURCE MANAGEMENT PLAN

MAP 2-12
NORTH HALF





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